

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
2010 Quadrennial Regulatory Review –)	MB Docket No. 09-182
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
Promoting Diversification of Ownership In)	MB Docket No. 07-294
the Broadcasting Services)	

REPLY COMMENTS OF

**OFFICE OF COMMUNICATION OF UNITED CHURCH OF CHRIST, INC.
MEDIA ALLIANCE
NATIONAL ORGANIZATION FOR WOMEN FOUNDATION
COMMUNICATIONS WORKERS OF AMERICA
COMMON CAUSE
BENTON FOUNDATION
MEDIA COUNCIL HAWAII
PROMETHEUS RADIO PROJECT**

Of counsel:

Chuck Coughlin
Benjamin Jacobs
Georgetown Law Students

Angela J. Campbell
Laura M. Moy^{*}
Institute for Public Representation
Georgetown Law
600 New Jersey Avenue, NW
Washington, DC 20001
(202) 662-9535

Filed: April 17, 2012

Counsel for UCC et al.

^{*} Admitted to the Maryland bar only; DC bar membership pending. Practice supervised by members of the DC bar.

SUMMARY

UCC *et al.* support the Leadership Conference on Civil and Human Rights' call on the Commission to take immediate action to improve its data collection concerning broadcast station ownership by women and people of color, to increase ownership opportunities for minorities and women, and to cease any and all proposals to permit further media consolidation until it complies with the court mandate in *Prometheus II*. The recent passage of the Spectrum Act provides another reason to not further relax any existing ownership limits. As the Commission told the Supreme Court, that law has the potential to alter the television marketplace in significant ways. And as UCC *et al.* explained in prior comments, allowing broadcast television stations to return spectrum for a share in the auction proceeds and/or to share spectrum is likely to result in less spectrum being available for broadcasting and thus greater consolidation. Having in place policies to ensure opportunities for minorities and women to own broadcast stations therefore takes on even greater force.

Although the Commission should not relax its ownership limits at this time, it should act swiftly to prevent any further circumvention of its ownership limits by means of sharing arrangements. Comments filed by television station owners indicate that sharing arrangements are being widely used in markets where the local television rule prohibits any further mergers or acquisitions. If stations in these markets are truly failing, they should attempt to find an outside buyer, and if that is not possible, seek a failing station waiver. By instead entering into covert sharing arrangements, they prevent new entry.

UCC *et al.* urge the Commission to require public disclosure of all sharing arrangements and adopt a bright-line multifactor test for attributing sharing arrangements where the public

interest harms exceed the public interest benefits. Existing arrangements that would become attributable under this test should be afforded only limited grandfathering.

Finally, UCC *et al.* provide a more detailed look at minority ownership of full-power commercial television stations using the same data that was summarized in the Notice of Proposed Rulemaking. This detailed examination of the FCC data shows that the state of minority ownership is even worse than the numbers alone might indicate. Not only is the percentage of minority-owned stations far below the percentage of each group in the population, but most minority stations tend to be located either in small markets or on the fringes of larger markets and only a handful are affiliated with a major network. Moreover, many states and cities with large minority populations have no minority-owned stations.

Table of Contents

SUMMARY	i
I. The Commission Should Not Relax Any Broadcast Ownership Rules at this Time.....	1
II. The Commission Should Promptly Adopt an Attribution Rule for Sharing Arrangements.....	4
A. Sharing Arrangements Are Widely Used to Circumvent the Local TV Rules	4
B. Sharing Arrangements Are Not Needed to Ensure Station Survival	6
C. Many Sharing Arrangements Do Not Result in Sufficient Public Interest Benefits to Offset the Harms from Reduced Competition and Diversity	10
D. The Commission Should Require that Licensees Disclose All Sharing Arrangements to the Public.....	14
E. The Commission Should Adopt a Bright-Line Test for Attributing Sharing Arrangements.....	15
F. The Commission Should Limit Grandfathering of Sharing Arrangements that Would Be Attributed Under the New Rule.....	18
III. Analysis of the 2009 Television Ownership Data Shows that Minorities Own Few Stations and those Stations Are Generally in Smaller Markets and Rarely Affiliated with a Major Network	19
A. African-American Communities are Underserved and Unrepresented Among Commercial Television Owners	21
B. Asian American-Owned Stations Are Rare in Markets with Large Asian-American Communities and Are Vulnerable to Market Consolidation.....	24
C. Native Hawaiians or Pacific Islanders Control Only One Station and it Is Located in Guam.....	27
D. The Small Number of Native American-Owned Stations Are Controlled by an Even Smaller Number of Owners	27
E. Many Large Hispanic Communities Lack Hispanic-Owned Broadcast Stations and Existing Hispanic Stations Are Vulnerable to Market Consolidation	29
F. Stations Designated as “No Controlling Interest” Are Licensed Mostly to Large Corporations	34
IV. Conclusion	35
Appendix A: Table 10 – No Controlling Interest Stations by DMA Rank	A-1
Appendix B: Table 11 – No Controlling Interest Stations by Owner	A-9

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
2010 Quadrennial Regulatory Review –)	MB Docket No. 09-182
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
Promoting Diversification of Ownership In)	MB Docket No. 07-294
the Broadcasting Services)	

Reply Comments

The Office of Communication of the United Church of Christ, Inc., Media Alliance, National Organization for Women Foundation, Communications Workers of America, Common Cause, Benton Foundation,¹ Media Council Hawai’i, and Prometheus Radio Project (“UCC *et al.*”), by their attorneys, the Institute for Public Representation (“IPR”), reply to comments filed in the 2010 Quadrennial Review (“QR”).

I. The Commission Should Not Relax Any Broadcast Ownership Rules at this Time

Many commenters agree with UCC *et al.* that before relaxing any ownership limits, the Commission should comply with the Third Circuit’s mandate that it adopt a meaningful

¹ The Benton Foundation is a nonprofit organization dedicated to promoting communication in the public interest. These reply comments reflect the institutional view of the Foundation, and unless obvious from the text, are not intended to reflect the views of individual Foundation officers, directors, or advisors.

definition of “eligible entities” and analyze the impact of its rules and proposed changes on opportunities for minorities and women to own broadcast stations.²

A recent development also suggests that further relaxation of the rules would be inappropriate at this time. Several parties have asked the Supreme Court to review *Prometheus II*. In opposition, the Commission argued that a recently enacted Spectrum Law³ has the potential to alter the television marketplace in significant ways. This law “authorizes the Commission to allow television licensees to return their spectrum assignments to the agency for other uses, such as wireless telecommunications services, and share the auction proceeds with the former licensee.”⁴ As the Commission told the Court, “[a]lthough the new legislation is unlikely to have an immediate impact on the television marketplace, any reclamation of spectrum in the longer term could reduce the number of broadcast stations across the country and . . . alter the economics of television markets.”⁵

As UCC *et al.* have pointed out in another proceeding, *Innovation in the Broadcast Television Bands*, ET Docket No. 10-235, spectrum repurposing and channel sharing could reduce opportunities for minorities and women—and consequently diversity of viewpoints—in several ways. First, because the purpose of the legislation is to reallocate broadcast spectrum for

² Comments of Alliance for Women in Media, Inc., MB Dkt. No. 09-182, at 3, 6-7 (filed Mar. 5, 2012); Comments of the Diversity and Competition Supporters, MB Dkt. No. 09-182, at 15-18 (filed Mar. 5, 2012); Comments of Free Press, MB Dkt. No. 09-182, at 8-12 (filed Mar. 5, 2012) [hereinafter Free Press Comments]; Comments of Leadership Conference on Civil and Human Rights, MB Dkt. No. 09-182, at 3-4 (filed Mar. 5, 2012) [hereinafter LCCHR Comments]; Comments of National Hispanic Media Coalition (NHMC), *et al.*, MB Dkt. No. 09-182, at 30-35 (filed Mar. 5, 2012).

³ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156 (2012).

⁴ Brief for the Federal Respondents in Opposition at 16, *National Ass’n of Broadcasters v. FCC*, No. 11-698 (Mar. 2012).

⁵ *Id.*

other purposes, it seems likely that the Commission will not license any new television stations.⁶ As a result, opportunities for new entrants to obtain licenses through auctions could be eliminated.

Second, we show in Part III that most minority-owned television stations tend to be in small markets, or on the fringes of larger markets, and rarely have affiliations with major networks. As a result, these stations are the very stations that are most likely to be interested in relinquishing spectrum rights in exchange for a share of the auction proceeds. Nor is spectrum sharing likely to provide an attractive alternative for minority owners. Because stations owned by minorities and/or women typically operate with less capital and advertising dollars, they would have unequal bargaining power in negotiating spectrum sharing arrangements. Moreover, if the Commission limits channel sharing to existing television licensees, as proposed in Docket 10-235, it would eliminate the possibility of new entrants.⁷

Finally, given all of the uncertainty regarding future use of the spectrum, UCC *et al.* are concerned that relaxing the local television rules could create incentives for existing television broadcasters to acquire a second or third station not for the purpose of providing additional

⁶ See David Oxenford, *While Few Vie for New VHF TV Stations in NJ and Delaware, FCC Sets Comment Date on Improving VHF Digital Reception and TV Channel Sharing with Must Carry Rights as Ways to Help Clear TV Band for Broadband Users*, Broadcast Law Blog (Feb. 6, 2011), <http://www.broadcastlawblog.com/2011/02/articles/broadband-report/while-few-vie-for-new-vhf-tv-stations-in-nj-and-delaware-fcc-sets-comment-date-on-improving-vhf-digital-reception-and-tv-channel-sharing-with-must-carry-rights-as-ways-to-help-clear-tv-band-for-broadband-users/>.

⁷ *Innovation in the Broadcast Television Bands: Allocations, Channel Sharing and Improvements to VHF*, Notice of Proposed Rulemaking, ET Dkt. No. 10-235, 25 FCC Rcd. 16498 (rel. Nov. 2010). Instead, the Commission could allow new entrants to enter into channel sharing agreements with incumbent broadcasters. Indeed, such a proposal, known as the S-Class television license, was made by the FCC's Advisory Committee on Diversity for Communications in the Digital Age in 2008. FCC, Recommendation on S-Class Television Licenses (2008), available at <http://transition.fcc.gov/DiversityFAC/adopted-recommendations/s-class-licenses-102808.pdf>.

program service to the public, but rather to profit from future spectrum auctions.⁸ The Commission should not take any action that could unjustly enrich broadcasters in this manner.

II. The Commission Should Promptly Adopt an Attribution Rule for Sharing Arrangements

Although the Commission should not relax its ownership limits at this time, it should act swiftly to prevent any further circumvention of those limits by means of sharing arrangements.

A. Sharing Arrangements Are Widely Used to Circumvent the Local TV Rules

Many commenters took note of the recent growth in sharing arrangements and the detrimental impact that these arrangements have on competition, diversity and localism. Free Press, for example, notes that “in the absence of much needed FCC oversight, reliance on these arrangements is increasing.”⁹ Similarly, AFTRA observes that “many owners have looked for ways to realize the cost savings of consolidation while circumventing the Commission’s rules. More than 60 percent of TV stations polled say they have in place some form of cooperative news-sharing agreement with another station or medium, while *nearly one-third* of TV stations say they are running news produced by another station.”¹⁰ It notes that “[p]erhaps the greatest harm from these arrangements comes from SSA’s, which can lead to the wholesale elimination of one station’s news staff, and reduces the diversity in local news voices.”¹¹

⁸ Since stations can already provide additional programming by multicasting, something which few are actually doing, they should not be permitted to acquire control over a second station unless they are already using all their licensed spectrum to the maximum extent.

⁹ Free Press Comments at 50.

¹⁰ Comments of American Federation of Television and Radio Artists, MB Dkt. No. 09-182, at 4 (filed Mar. 5, 2012) [hereinafter AFTRA Comments] (footnotes omitted).

¹¹ *Id.*

Broadcasters do not deny that the number of stations participating in sharing agreements has increased, especially in smaller markets. The Coalition to Preserve Local Broadcasting (“Coalition”), for example, describes itself as thirteen group owners, who collectively own eighty-eight stations, each of which is “party to one or more [SSAs], [JSAs], news production and/or news sharing agreements, [LMAs], full-power/low power combinations . . . and multicast network affiliations.”¹² Nexstar reports that it has local service agreements to provide services to seventeen full-power television stations owned by Mission Broadcasting, Inc. or Sinclair Broadcast Group.¹³ New Vision and TTBG participate in six sharing agreements in small and mid-sized markets.¹⁴

Indeed, at least one new sharing arrangement has been entered into since the Commission released the NPRM at the end of 2011. On March 27, 2012, the Commission approved the sale of Toledo, Ohio television station WUPW (a Fox affiliate) from LIN Media to American Spirit Media. The sale contract includes a “service-sharing agreement” with Raycom’s WTOL (an NBC affiliate) that “allows the stations to share news staff and broadcasts” and provides “access to studios, technical facilities, maintenance, and promotional efforts” for eight years.¹⁵

¹² Comments of Coalition to Preserve Local TV Broadcasting, MB Dkt. No. 09-182, at ii (filed Mar. 5, 2012) [hereinafter Coalition Comments].

¹³ Comments of Nexstar, MB Dkt. No. 09-182, at 28 (filed Mar. 5, 2012) [hereinafter Nexstar Comments].

¹⁴ Joint Comments of New Vision Television LLC and TTBG LLC, MB Dkt. No. 09-182, at 2-3 (filed Mar. 5, 2012) [hereinafter Joint Comments].

¹⁵ Kris Turner, *FCC Approves Channel 36 Sale; 63 Layoffs Loom*, Toledo Blade, Mar. 37, 2012, available at <http://www.toledoblade.com/TV-Radio/2012/03/27/Channel-36-s-sale-finalized-63-layoffs-loom.html> (“Service-sharing agreements, which are on the rise in small and midsized markets, often lead to the shuttering of news departments and layoffs.”). This is the fifth such agreement in place between local television stations in Ohio.” Josh Stearns, *Collaboration, Competition and Consolidation: Where Is the Line?*, Mediashift, Apr. 4, 2012, available at <http://www.pbs.org/mediashift/2012/04/collaboration-competition-and-consolidation-where-is-the-line095.html>.

All commenters opposing attribution of sharing arrangements support repeal or relaxation of the local television rule.¹⁶ They candidly acknowledge that most sharing arrangements, if attributed, would violate the current local television limits. For example, the Coalition states that many of their sharing arrangements “involve two or more same-market program streams affiliated with the ‘Big Four’ networks of NBC, CBS, ABC, and FOX.”¹⁷ Gray Television also urges outright repeal or substantial relaxation of the local TV limits, but argues in the alternative that: “If the Commission does not eliminate its television duopoly restrictions, it must leave room for cooperative arrangements such as [LMAs], [SSAs], and [JSAs].”¹⁸ Thus, the Commission must act promptly to prevent further circumvention of the local TV limits.

B. Sharing Arrangements Are Not Needed to Ensure Station Survival

Several broadcast commenters argue that SSAs are necessary for stations’ survival. For example, Entravision claims that “[g]iven the combination of general economic conditions and the prolonged, broadcast-specific decline in advertising revenue, SSAs are more often than not a matter of necessity. Broadcasters that can stand on their own do not consider SSAs or other arrangements; it is only when the cost of operations, including the high cost of the digital transition, outweighs revenue that SSAs are given consideration and entered into.”¹⁹ Similarly, the National Association of Broadcasters (“NAB”) argues that “sharing arrangements allow

¹⁶ Not all broadcasters support sharing arrangements, however. *See* Comments of Hubbard Broadcasting Inc., MB Dkt. No. 09-182 (filed Jul. 12, 2010) [hereinafter Hubbard NOI Comments].

¹⁷ Coalition to Preserve Local TV Broadcasting Comments at ii.

¹⁸ Comments of Gray Television Inc., MB Dkt. No. 09-182, at 9 (filed Mar. 5, 2012) [hereinafter Gray Comments]. *See also* Nexstar Comments at 27-31 (arguing that FCC must allow shared services until duopoly relief is provided).

¹⁹ Comments of Entravision Holdings LLC, MB Dkt. No. 09-182, at 12 (filed Mar. 5, 2012) [hereinafter Entravision Comments]. *See also* Gray Comments at 9 (“[i]f the Commission does not eliminate its television duopoly restrictions, it must leave room for cooperative arrangements”).

broadcasters, especially in small markets, to reduce their fixed costs and continue to operate where it would otherwise be uneconomic to do so.”²⁰ LIN also reports that “a great number of standalone stations enter or come close to bankruptcy,” and that it “believes sharing arrangements can alleviate such financial issues.”²¹

It is far from clear that stations need sharing arrangements to survive. Indeed, New Vision admits that “2010 was generally a good year for broadcasters with revenues up approximately 23%.”²² 2012 is shaping up to be an even better year with all of the money pouring in for election-related advertising.²³ But if a broadcaster cannot support itself, Free Press suggests that it might be preferable as a matter of public policy for that broadcaster to sell the station to a new entrant or relinquish its spectrum for auctioning.²⁴

²⁰ Comments of National Association of Broadcasters, MB Dkt. No. 09-182, at 59 (filed Mar. 5, 2012) [hereinafter NAB Comments] (citing Jeffrey A. Eisenach & Kevin W. Caves, *The Effects of Regulation on Economies of Scale and Scope in TV Broadcasting* 11-16 (2011)).

²¹ Comments of LIN Television Corporation, MB Dkt. No. 09-182, at 11 (filed Mar. 5, 2012) [hereinafter LIN Comments]; see also Coalition Comments at 3-4, 15; Joint Comments at 2 (arguing that broadcasters in small- and medium-sized markets are unable to “harness certain back-end efficiencies”).

²² Joint Comments at 7.

²³ Ted Johnson, *Station Stimulus: Broadcast Biz Starting to See 2012 Campaign Windfall*, Variety (Apr. 16, 2012) (“Signs still point to a record-setting year in broadcast political advertising, with estimates that spending on local television could hit \$2.6 billion”); Paul Thomasch & Lisa Richwine, *TV Broadcasters Enjoy Spoils of Political Wars*, Reuters (Jan. 7, 2012) <http://www.reuters.com/article/2012/01/07/us-advertising-politicsidUSTRE8060AE20120107> (“Around 85 percent of the money that is raised and spent on advertising historically goes toward local broadcast TV. In 2012, that could total between \$2.5 billion to \$3.0 billion, said Ken Goldstein, president of Kantar Media's Campaign Media Analysis Group.”); D.M. Levine, *Shot in Arm Expected for 2012 Political Ad Spend: MediaVest Report Expects Big Jump After Slow Start*, Adweek (Dec. 27, 2011) <http://www.adweek.com/news/television/shot-arm-expected-2012-political-ad-spend-137283>.

²⁴ Free Press Comments at 57–58. LIN argues that shared service should be permitted based on its belief that “the 25 largest US markets generally can support four to six independent local news ‘voices,’ including daily newspapers of general circulation and television broadcast newsrooms. LIN also believes that markets 26–50 can support three or four local news voices, and markets 51–100 can support perhaps two or three newsrooms.” LIN Comments at 9. Thus, it

In the alternative, a broadcast station that is in financial trouble will likely qualify for a waiver under the failing station rule. To obtain a failing station waiver, the applicant must show that “the in-market buyer is the only entity ready, willing and able to operate the station, and that sale to an out of market applicant would result in an artificially depressed price.”²⁵ The explicit purpose of this requirement is to ensure that “minorities and women interested in purchasing a station will have an opportunity to bid.”²⁶ A report issued by Government Accountability Office in 2008 explains why this requirement helps promote entry by women and minorities:

since stations generally do not advertise their properties for sale, individuals and companies looking to purchase a station must have cash on hand. Prospective buyers cannot wait for an announced sale and then acquire financing. *This is a challenge for minority and women broadcasters*, who often lack information on upcoming station sales and generally have fewer financial resources.²⁷

Indeed, there is reason to believe that if a failing station tried to find a new buyer instead of engaging in shared services, it would promote diversity, localism and competition. For example, Media Council Hawai‘i (“MCH”) has been monitoring station ownership in Hawai‘i

concludes that in “almost all cases, the number of separately owned television stations . . . is greater than the number of high quality news operations that the market can reasonable support with available revenue.” *Id.* LIN provides no evidence to support its “belief.” Even if we assume that some markets cannot support the current number of independently owned stations, it does not follow that the public interest is served by propping up these stations instead of letting them fail and put the spectrum to a more valuable use.

²⁵ 47 C.F.R. § 73.3555, n. 7 (2012). The application must also show that it meets on of the tests that demonstrating that one of the stations in in financial distress, and such waivers are not available where the in market buyer already controls another station in the market.

²⁶ *Review of the Commission's Regulations Governing Television Broadcasting*, Report and Order, MM Dkt. No. 91-2211, 14 FCC Rcd. 12903, 12937 (1999). *See also Prometheus Radio Project v. FCC*, 373 F.3d 372, 420 (3d Cir. 2004); *Prometheus Radio Project v. FCC*, 652 F.3d 431, 465 (3d Cir. 2011).

²⁷ Government Accountability Office, Report to the Chairman, Subcommittee on Telecommunications and the Internet, Committee on Energy and Commerce, *Media Ownership, Economic Factors Influence the Number of Media Outlets in Local Markets, While Ownership by Minorities and Women Appears Limited and Is Difficult to Assess* 25 (2008) available at <http://www.gao.gov/assets/280/273671.pdf> (emphasis added).

for many years. MCH is particularly concerned that none of the stations in Hawai`i are locally owned and none are controlled by Native Hawaiians. In 2006, Emmis sought to sell station KGMB, a CBS affiliate, creating an opportunity for local ownership.²⁸ The Office of Hawaiian Affairs (OHA)²⁹ was interested in buying it, but decided against it after other investor groups made offers of \$22 million and \$25 million for the station.³⁰ MCG Capital ended up purchasing KGMB for [about \$40 million].³¹ A few years later, MCG Capital entered into a sharing arrangement with Raycom. MCG and Raycom claimed that the sharing arrangement was necessary for the stations' survival.³² By swapping call signs and affiliation agreements, Raycom obtained direct control over KGMB as well as NBC affiliate KHNL and started providing news programming for all three stations. If MCG Capital had sought a buyer without a station in the market instead of entering into this sharing agreement, it is possible that OHA or other local entities would have been interested in purchasing it.

²⁸ Erika Engle, *Buying KGMB TV on OHA Agenda*, Honolulu Star-Bulletin, July 6, 2006, available at <http://archives.starbulletin.com/2006/07/06/news/story01.html>.

²⁹ OHA functions operationally as both a government agency with a strong degree of autonomy and as a trust. Its mission is to protect Hawai`i's people and environmental resources and OHA's assets, toward ensuring the perpetuation of the culture, the enhancement of lifestyle and the protection of entitlements of Native Hawaiians, while enabling the building of a strong and healthy Hawaiian people and nation, recognized nationally and internationally. Office of Hawaiian Affairs – Vision & Mission (last visited Apr. 16, 2012), http://www.oha.org/index.php?option=com_content&task=blogcategory&id=23&Itemid=127.

³⁰ OHA approved a proposal to make a conditional offer to purchase the station and commit up to \$50,000 for the cost of researching it. Erika Engle, *Buying KGMB TV on OHA Agenda*, Honolulu Star-Bulletin, July 6, 2006, available at <http://archives.starbulletin.com/2006/07/06/news/story01.html>.

³¹ Press Release, *MCG Capital Invests \$40 Million in GMC Television* (Jun. 11, 2012), available at http://files.shareholder.com/downloads/mcgc/0x0x124306/14ebc183-852b-4e26-b8df-028a20dbf87b/MCGC_News_2007_6_11_General.pdf.

³² *Complaint and Request for Emergency Relief Regarding Shared Services Agreement among Affiliates of Raycom Media, Inc. and HITV License Subsidiary, Inc., et al., Involving Television Stations KHNL, KFVE, and KGMB, Honolulu, Hawaii*, Response to “Complaint and Request for Emergency Relief Regarding Shared Services Agreement,” at 3–6 (filed Oct. 19, 2009).

This example illustrates how the public may be worse off if stations in financial trouble enter into sharing arrangements than if they seek a failing station waiver. Sharing arrangements eliminate the possibility of bringing in a new voice, possibly even a minority- or woman-owned broadcaster, into the market. But even if a failing station cannot find a purchaser and obtains a waiver, at least the FCC could oversee the process and ensure that the merger is necessary to save a station. By contrast, the FCC often is not even aware that stations have entered into shared services agreements, much less taking the opportunity to assess whether such agreements are necessary for a station's survival.

C. Many Sharing Arrangements Do Not Result in Sufficient Public Interest Benefits to Offset the Harms from Reduced Competition and Diversity

Television broadcasters opposing attribution of SSAs typically argue that shared services are in the public interest because they increase the quantity of locally produced news. Entravision, for example, admits that a sharing arrangement may result in “not as vibrant a competitive environment as might exist with two independent news operations,”³³ but asserts that the reduced competition is offset by the ability to provide “critical access to the resources local television stations need to bring local news and public affairs programming.”³⁴ The Coalition contends that the increased use of sharing arrangements “over the past decade has been the catalyst for an unprecedented expansion of local news production across the county, and particularly in mid-sized and small markets.”³⁵

While some joint operations may lead to an increase in the number of hours of local news programming, the amount of news gathered and the quality of the reporting often decrease.

³³ Entravision Comments at 12.

³⁴ *Id.*

³⁵ Coalition Comments at ii.

AFTRA points out that there has been a “decrease in station staff, occurring at the same time as increases in both the number of local news hours produced (a 35 percent increase in traditional broadcast local TV news hours) and the number of distribution platforms (mobile, web, etc.). As the number of hours to fill has increased and the number of employees has decreased, reporters have produced fewer long-form and investigative stories, and have increasingly shot and edited their own stories.”³⁶ Sharing agreements are not a solution to this problem, but rather exacerbate it because they “can lead to the wholesale elimination of one station’s news staff.”³⁷

Moreover, much of the “increase” in local news consists simply of rebroadcasts of the same news programming. Free Press has collected video clips from around the country showing that sharing arrangements often lead to the airing of “carbon-copy local newscasts on multiple, supposedly ‘competing’ local TV stations.”³⁸ For example, in Hawai`i the CBS and NBC affiliates used to have independent newscasts. Now they simulcast the same newscast produced by Raycom’s Hawai`i News Now, which also produces a similar newscast for a third station. Even if, as New Vision asserts, stations feature different journalists and different stories, the content still comes from the same source and therefore is not truly diverse or competitive.³⁹ The Commission should not count duplicate news programming as part of its analysis of media diversity and fulfillment of the public interest standard.⁴⁰

Some broadcasters cite anecdotes to support their claims that sharing arrangements benefit the public. For example, to demonstrate how sharing arrangements increase local

³⁶ AFTRA Comments at 2 (internal citations omitted).

³⁷ *Id.* at 4.

³⁸ Free Press Comments at 50.

³⁹ Joint Comments at 12.

⁴⁰ See Cheryl Leanza, *Monolith or Mosaic: Can the Federal Communications Commission Legitimately Pursue a Repetition of Local Content at the Expense of Local Diversity?*, 53 Am. Univ. L. Rev. 597 (2004).

programming, LIN states that “after entering into a sharing arrangement with LIN, WBDT (CW), Dayton, Ohio used the promotion and marketing resources of LIN’s station WDTN (NBC) to launch the ‘CW Star’ contest, bringing the station its first local, on-air talent. The CW Star attends community events, appears on-air on WBDT, and assists community organizations.”⁴¹ And as an example of how sharing arrangements increase diversity, LIN states that “with the promotional support of LIN’s KXAN (NBC), Austin’s KNVA was able to hire two previous African-American CW Stars with non-traditional backgrounds to serve as on-air personalities.”⁴² Even assuming for the purpose of argument that the CW affiliates would not have been able to hold a contest or hire on-air talent without LIN’s promotional support, these types of benefits cannot possibly outweigh the benefits to localism and diversity that would occur if the stations were operated independently.

While it is possible that some sharing arrangements may not be inconsistent with the public interest, the record here shows little merit in the ones currently in operation. Fox distinguishes Local News Sharing Agreements (“LNSs”) from SSAs, labeling LNSs as “innocuous arrangements that simply enable independently owned stations to share raw video footage of news events in a manner akin to the video pool arrangements that long have been a hallmark of good and ethical journalism.”⁴³ Fox claims that “LNS agreements actually enhance

⁴¹ LIN Comments at 10.

⁴² *Id.* at 12.

⁴³ Comments of Fox Entertainment Group, Inc. and Fox Television Holdings, Inc., MB Dkt. No. 09-182, at 4 (filed Mar. 5, 2012) [hereinafter Fox Comments]. “Each day, the managing editor assigned to the LNS team sends around to all participating stations a list of the news events at which the LNS team plans to obtain video footage (e.g., a political press conference or the scene of a newsworthy casualty event such as a forest fire). The assignment editors assigned to the LNS team coordinate with the various video photographers to ensure that each is in place for the assigned events.” Fox Comments at 33.

localism and diversity because they free individual stations to devote their resources to pursuing additional news stories and unique news coverage.”⁴⁴

UCC *et al.* disagree with Fox’s claim that “an LNS agreement is precisely describable as a media pool, much like the White House video pool.”⁴⁵ Unlike traditional coverage “pools,” LNSs are not designed to accommodate physical access or space constraints. Increasingly, LNSs are covering breaking news stories and not just pre-planned events.⁴⁶ One Fox executive has even bragged that their LNSs have “grown from a video-sharing partnership to a real breaking-news service.”⁴⁷

Fox’s claim that LNSs confer no influence on editorial decisions is belied by Fox’s own description of how LNS agreements typically work, which indicates that decisions about which events to cover are made by the managing editor of the LNS team.⁴⁸ Moreover, the fact that participating stations are permitted to send their own video photographer to an event covered by the LNS team⁴⁹ does not eliminate the concern about homogenized news. Once an LNS is in place, stations have little economic incentive to send a separate crew because it will cost them more money, and the purpose of the LNS is to save money. As a result, the public will rarely

⁴⁴ *Id.* at 31.

⁴⁵ *Id.* at 34.

⁴⁶ Originally, participants in the Philadelphia LNS said they would use it to primarily cover “routine” events, but it has grown to the point that it is now producing up to thirty video pieces a day. P.J. Bednarski, *Philly Stations Like Share and Share Alike*, TVNewsCheck, Apr. 21, 2010, available at <http://www.tvnewscheck.com/article/2010/04/21/41639/philly-stations-like-share-and-share-alike>.

⁴⁷ Michael Malone, *Swim at Your Own Risk*, Broadcasting & Cable, Jun. 8, 2009, available at <http://broadcastunionnews.blogspot.com/2009/06/swim-at-your-own-risk.html>.

⁴⁸ Comments of Communications Workers of America and Media Council Hawai‘i, GN Dkt. No. 10-25, at 12–13 (filed May 7, 2010) [hereinafter CWA Future of Media Comments].

⁴⁹ Fox Comments at 33.

receive multiple viewpoints on newsworthy local events.⁵⁰ This problem is particularly acute in places like Austin, Texas (DMA-49), where the local Fox, ABC, NBC, and CBS affiliates all participate in the LNS.⁵¹

Thus, LNSs diminish diversity and competition because the stations no longer compete to obtain the best coverage. Stations are also left with limited resources for independent newsgathering. Along with the usual layoffs associated with LNSs,⁵² each station must devote resources to the venture. At the same time, however, LNSs do not confer the same degree of influence as many other sharing arrangements. For this reason, UCC *et al.* continue to believe that LNSs should be considered as a relevant but not dispositive factor in determining attributable interests.⁵³

D. The Commission Should Require that Licensees Disclose All Sharing Arrangements to the Public

NAB contends that the Commission should not require broadcasters to disclose even the existence of sharing arrangements.⁵⁴ UCC *et al.* strongly disagree. Many of the signatories to

⁵⁰ Jill Geisler, a scholar at the Poynter Institute journalism school, warns that LNS coverage may become nothing more than “stenography,” including only the obvious “who, what, and where” and not “the more valuable ‘why and how.’” Jill Geisler, *Six Hazards of TV News Pooling and How to Avoid Diluting Your Coverage*, Poynter Online, May 28, 2009, <http://www.poynter.org/how-tos/leadership-management/what-great-bosses-know/96014/six-hazards-of-tv-news-pooling-and-how-to-avoid-diluting-your-coverage/>.

⁵¹ Kim McAvoy, *News Sharing: One for All, All for One?*, TVNewsCheck, May 20, 2009, available at <http://www.tvnewscheck.com/article/2009/05/20/32369/news-sharing-one-for-all-all-for-one>.

⁵² “For example, in Los Angeles, 120 people were laid off at the Fox station KTTV with the advent of their LNS.” CWA Future of Media Comments at 11. See Geisler, *supra* note 50 (warning that though sharing might theoretically free up resources for enterprise journalism, “in these tight times management may be tempted to see the pool arrangement as ‘outsourcing’ and an excuse to cut positions”).

⁵³ See Comments of UCC *et al.*, MB Dkt. No. 09-182, at 19–20 (filed Mar. 5, 2012) [hereinafter UCC Comments].

⁵⁴ NAB Comments at 68.

these comments are also members of Public Interest Public Airwaves Coalition (“PIPAC”). PIPAC strongly supported disclosure of all forms of sharing arrangements in comments filed in the Enhanced Disclosure Docket 00-168. PIPAC pointed out that the Commission already requires commercial television stations to put copies of time brokerage agreements and JSAs in their public inspection files, and that other types of sharing arrangements may be just as relevant to how the station is serving the public interest. The public has an interest in the amount, quality and content of programming offered by local broadcasters, as well as ensuring that licensees are not covertly circumventing the FCC ownership rules through sharing arrangements. Unless such agreements are available in the public file, it is exceedingly difficult for members of the public, or the Commission, to learn whether local news or other programming is generated by a station itself or is a product of an agreement with another entity, including other local broadcasters.⁵⁵

Recent press reports indicate that the Commission is not planning to require disclosure of SSAs in the Enhanced Disclosure proceeding.⁵⁶ If this is true, it is more important than ever that the Commission require public disclosure of all sharing arrangements in the 2010 QR.

E. The Commission Should Adopt a Bright-Line Test for Attributing Sharing Arrangements

While disclosure is an important first step, the Commission must also have a way to distinguish between sharing arrangements that benefit the public and those designed to evade the ownership limits. UCC *et al.*’s proposed multi-factor bright line test is designed to serve this

⁵⁵ Comments of the Public Interest Public Airwaves Coalition, MM Dkt. No. 00-168, at 19–21 (filed Dec. 22, 2011); *see also* Comments of Public Interest Public Airwaves Coalition, MM Dkt. No. 11-189, at 21 (filed Jan. 27, 2012).

⁵⁶ Jonathan Make, *Public Files Going to the Cloud, Under FCC Draft Order*, Comm. Daily, Apr. 11, 2012.

purpose.⁵⁷ Adoption of this test would both provide guidance to broadcasters and allow the Commission to review sharing arrangements in an efficient and fair manner.

UCC *et al.* strongly oppose the ad hoc approach advocated by some commenters. UCC *et al.* disagree that “allegations that certain agreements impermissibly transfer too much control over station operations . . . should be addressed on an individualized basis.”⁵⁸ Without adequate disclosure, a case-by-case approach cannot possibly work because most sharing arrangements would never come to the Commission’s attention. In addition, the current case-by-case approach has proven ineffective. Steve Lovelady of Fletcher, Heald & Hildreth, a law firm that represents many smaller broadcasters, has criticized the Commission’s case-by-case approach in a recent blog post. He writes that “[o]ne thing everybody can agree on [is that] . . . as a matter of regulations, SSAs and JSAs are not subject to specific definitions or easily identified parameters.”⁵⁹ The only guidelines for determining control are “‘certain boundaries’ that have not been generally publicized” developed from “a very small handful of high profile [Media Bureau] cases.”⁶⁰

Since a number of the [Video] Division’s (not to mention the Commission’s) policies aren’t written down anywhere, they can change from one day to the next and from one deal to the next. That, obviously, is not an ideal circumstance for anybody who might be trying to structure a deal to comply with whatever the applicable standards might be. . . . [T]here’s no guarantee that the staff won’t perceive in your particular deal some reason to change

⁵⁷ UCC Comments at 15-20.

⁵⁸ Comments of Tribune Company, Debtor-In-Possession, MB Dkt. No. 09-182, at 75 (filed Mar. 5, 2012) [hereinafter Tribune Comments].

⁵⁹ Steve Lovelady, *SSAs and JSAs – Some Unwritten Rules*, CommLawBlog (Mar. 26, 2012), http://www.commlawblog.com/2012/03/articles/broadcast/ssas-and-jsas-some-unwritten-rules/?utm_source=feedburner&utm_medium=feed&utm_campaign=Feed%3A+CommLawBlog+%28CommLawBlog%29.

⁶⁰ *Id.*

things up along the way without telling anybody (including you) in advance.⁶¹

While broadcasters and UCC *et al.* may disagree about the substance of the rules, we can all agree that rules should be clear so that broadcasters can comply with them and the public can know what is expected. Moreover, case-by-case evaluation wastes valuable resources. It takes a lot of time and resources for the Bureau to investigate and determine whether sharing agreements amount to control on a case-by-case basis.⁶² In the Hawai`i case, for example, it took over two years for the Bureau to act on MCH's emergency complaint.⁶³ In December 2011, MCH filed an application for review, which is still pending.⁶⁴ Other applications for review have been pending for several years without any resolution.⁶⁵

In sum, the case-by-case approach lacks transparency, is inefficient, and has not effectively protected the public from sharing arrangements that reduce competition, diversity and localism. Thus, the Commission should adopt a rule to attribute sharing arrangements as proposed by UCC *et al.*

⁶¹ *Id.*

⁶² UCC Comments at 21.

⁶³ *KHNL/KGMB License Subsidiary, LLC, Licensee of Stations KHNL(TV) and KGMB(TV), Honolulu, Hawaii and HITV License Subsidiary, Inc., Licensee of Station KFVE(TV), Honolulu, Hawaii*, Memorandum Opinion and Order and Notice of Apparent Liability for Forfeiture, DA 11-1938 (adopted Nov. 22, 2011).

⁶⁴ *KHNL/KGMB License Subsidiary, LLC, Licensee of Stations KHNL(TV) and KGMB(TV), Honolulu, Hawai`i and HITV License Subsidiary, Inc., Licensee of Station KFVE(TV), Honolulu, Hawai`i*, Application for Review (filed Dec. 27, 2011).

⁶⁵ *E.g.*, Malara Broadcast Group of Duluth Licensee LLC, 19 FCC Rcd. 24070 (M.B. 2004), application for review filed by KQDS Acquisition Corp. et al. on Jan. 13, 2005; Piedmont Television of Springfield License, LLC, 22 FCC Rcd. 13910 (M.B. 2007), application for review filed by Koplar Communications on Aug. 29, 2007.

F. The Commission Should Limit Grandfathering of Sharing Arrangements that Would Be Attributed Under the New Rule

Most broadcasters argue that if the Commission decides to attribute certain sharing arrangements, those currently in operation should be grandfathered. Tribune, for example, argues that not grandfathering sharing arrangements penalizes broadcasters who entered compliant arrangements under their current understanding of the ownership rules only to have the rules changed “midstream.”⁶⁶ On the other hand, Hubbard Broadcasting opposes grandfathering, noting that “parties that have been in violation of the current rule should not be permitted to profit from behavior that was inconsistent with the letter and spirit of the duopoly rule or benefit from the lack of decision-making under past administrations.”⁶⁷

Due to variations in sharing arrangements and the uncertainties created by case-by-case review discussed above, it is difficult to say whether existing arrangements are consistent with existing rules. What is clear, however, is that grandfathering existing sharing arrangements would harm competition, diversity and localism. Moreover, it would put broadcasters that did not enter into such arrangements because they thought that they would violate FCC rules at a competitive disadvantage. Thus, any grandfathering should be tailored to provide sufficient time to terminate the agreements and no longer. Since many of these agreements are for seven or eight year terms and may be renewable, the Commission should not grandfather them for the remainder of the term. Nor should the Commission allow stations with prior sharing arrangements that are attributable under the rule to merge unless the merger complies with the local TV rule.

⁶⁶ Tribune Comments at 75.

⁶⁷ Hubbard NOI Comments at 4.

Compared to other situations—such as when the Commission adopted the newspaper/broadcast cross-ownership rule (“NBCO”) and decided to grandfather all but the most egregious existing combinations—requiring the termination of sharing arrangements should not cause much disruption for the industry or public. Since the stations involved are merely sharing resources or providing certain services, it should be much easier for them to resume separate operations or conform the agreements to meet the bright-line standard. However, the Commission should immediately put broadcasters on notice that sharing arrangements may become attributable so that if they enter into new sharing arrangements, they do so at their own risk. In addition, the Commission should act promptly to adopt a rule that prevents more stations from circumventing the ownership limits.

Finally, limiting grandfathering may create opportunities for new entrants. Because, as explained in the next section, minorities control very few television stations both in absolute numbers and in proportion to their presence in the population, it is especially important to take actions that create opportunities for new entry.

III. Analysis of the 2009 Television Ownership Data Shows that Minorities Own Few Stations and those Stations Are Generally in Smaller Markets and Rarely Affiliated with a Major Network

In its notice, the Commission failed to present adequate data regarding current ownership levels by women and people of color. As detailed extensively by the comments filed by members of The Leadership Conference on Civil and Human Rights, the Commission has failed for a number of years to either collect or analyze the data that the Third Circuit has demanded of it.⁶⁸

In ¶156, the NPRM presented findings drawn from Form 323 data about minority ownership of full-power television stations as of 2009. The Commission still has not provided

⁶⁸ LCCHR Comments at 3–7.

any analysis of its 2009 ownership data for women or for any services except full-power television. Nor has it presented any analysis of the 2011 ownership reports.⁶⁹

Counsel for UCC *et al.* requested that the Media Bureau provide them with: 1) copies of the analysis that led to the findings in ¶156; 2) any analysis and findings regarding ownership by women; 3) any analysis of minority and women's ownership of stations in the other services (low power TV, Class A TV, AM, FM); and 4) any analysis of the 2011 biennial ownership filings. The Media Bureau responded that it only had the spreadsheets used to compile the data in ¶156. Three spreadsheets were created by hand because the FCC was still trying to get the computer programs to work properly.

The spreadsheets provided by the Media Bureau did not include call signs, community of license, or DMA. However, IPR was able to use the facility identification numbers to identify call signs and then use the call sign to look up the stations in the 2009 Broadcast and Cable Yearbook. This information is displayed in the tables below, which report ownership listed by both DMA and the licensee's name. IPR also utilized 2010 U.S. Census data to compare the location of minority-owned stations with the geographical concentrations of minority populations. Our goal was to provide a more granular "snapshot" of the state of minority ownership of commercial television stations. It is not a pretty picture.

We found that the percentage of stations owned by each racial or ethnic group is vastly lower than each group's percentage of the population as a whole. We also found little correlation between the location of minority-owned stations and geographic areas with large minority populations. We further found that the vast majority of minority-owned stations are not affiliated with any of the four major networks (ABC, CBS, NBC, and Fox). As a result, these stations are

⁶⁹ 2012 UCC Comments at 36.

particularly vulnerable to acquisition under the FCC’s current local television ownership rule as well as under the proposed NBCO rule. These findings underscore that any further relaxation of ownership limits would not serve the public interest and that the Commission needs to adopt policies to promote ownership opportunities for women and minorities as soon as possible. Further, the need for private parties to develop this data, and the fact that it was possible for IPR to accomplish with our limited resources, demonstrates an overwhelming failure by the Commission to address this critical matter.

A. African-American Communities are Underserved and Unrepresented Among Commercial Television Owners

To determine the percentage of stations owned by each racial or ethnic group, the Commission “examined the race or ethnicity of owners with attributable voting interests in the entity that ultimately owns the station license and defined a controlling interest as an interest that exceeds 50 percent alone or in the aggregate.”⁷⁰ The FCC found that nine stations, accounting for 0.6% of all commercial television stations, had Black or African-American ownership. In contrast, the 2010 U.S. Census data found that African-Americans represent 14% of the U.S. population.⁷¹

Although approximately 55% of African Americans live in the southern United States, the highest concentrations are in major metropolitan areas such as New York, Chicago, and

⁷⁰ 2010 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Notice of Proposed Rulemaking, MB Dkt. No. 09-182, at n. 378 (rel. Dec. 22, 2011) [hereinafter NPRM].

⁷¹ Census figures show that 42 million Americans identify as African-American, either alone or in combination with other races. Sonya Rastogi, et al., *The Black Population: 2010* 3 (Sept. 2011), available at <http://www.census.gov/prod/cen2010/briefs/c2010br-06.pdf>. Moreover, between 2000 and 2010, the African-American population *increased at a faster rate* than the nation’s population as a whole. *Id.*

Philadelphia.⁷² As shown in Table 1, African-Americans own no stations in the New York DMA or Los Angeles DMA, despite the fact that approximately 4.7 million African-Americans reside in New York City and approximately 1.3 million reside in Los Angeles.⁷³ Moreover, even in major markets such as Chicago and Philadelphia, where African-Americans do own broadcast stations, the stations are licensed to communities at the periphery of the DMA. For example, the Chicago-area station (WJYS) is licensed to serve Hammond, Indiana, approximately twenty miles from downtown Chicago. The Philadelphia-area station (WMGM) is licensed to Wildwood, New Jersey, approximately seventy miles from downtown Philadelphia. We do not have sufficient information to determine whether these stations broadcast throughout their respective DMAs.

⁷² *Id.* at 8, 14. New York, Chicago, and Philadelphia, in that order, are the American cities with the largest African-American populations.

⁷³ The population of each DMA was determined by combining geographic information from Broadcasting & Cable Yearbook (2009) with population figures from the U.S. Census. U.S. Census Bureau, *State and County Quickfacts* (last visited Apr. 17, 2012), <http://quickfacts.census.gov/qfd/index.html>. The New York DMA includes Fairfield County, CT; Bergen, Essex, Hudson, Hunterdon, Middlesex, Monmouth, Morris, Ocean, Passaic, Somerset, Union, and Warren Counties, NJ; Bronx, Dutchess, Kings, Nassau, New York, Orange, Putnam, Queens, Richmond, Suffolk, Sullivan, Ulster, and Westchester Counties, NY; and Pike County, PA. The Los Angeles DMA includes Inyo, Kern, Los Angeles, Riverside, San Bernardino, and Ventura Counties, CA.

Table 1 – African American-Owned Commercial TV Stations by DMA Rank							
Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
32334	WJYS	not listed ⁷⁴	Hammond	IN	Chicago	3	Oxford Media Group, Inc.
61111	WMGM	NBC	Wildwood	NJ	Philadelphia	4	Access.1 Communications
60793	KCHF	not listed	Santa Fe	NM	Albuquerque-Santa Fe	44	Roberts Broadcasting Cos.
136750	WZRB	CW	Columbia	SC	Columbia	81	Roberts Broadcasting Cos.
136749	WRBJ	CW	Magee	MS	Jackson	90	Roberts Broadcasting Cos.
29706	WHTV	MyNetworkTV	Jackson	MI	Lansing	112	Venture Technologies Group, LLC
62293	KXVA	Fox	Abilene	TX	Abilene-Sweetwater	164	Bayou City Broadcasting LLC
13792	KTGF	license transferred to RGW Investments Sept. 28, 2010 ⁷⁵	Great Falls	MT	Great Falls	191	Density Licenses, LLC
58560	KIDY	Fox	San Angelo	TX	San Angelo	197	Bayou City Broadcasting LLC

Table 2 shows that the nine African-American-controlled stations have six different owners.⁷⁶ Roberts Broadcasting has three stations and Bayou City has two. None are duopolies. This data confirms the conventional wisdom that most minority-owned stations are “stand-alone” and thus find it difficult to compete for viewers in consolidated markets, as well as to compete for programming and talent against large group owners.

⁷⁴ Affiliations categorized as “not listed” could not be determined using data available in Broadcasting & Cable Yearbook (2009).

⁷⁵ See Destiny Licenses, LLC, Consummation Notice (filed Sept. 28, 2010), *available at* https://licensing.fcc.gov/cgi-bin/ws.exe/prod/cdbs/forms/prod/cdbsmenu.htm?context=25&appn=101400814&formid=905&fac_num=13792.

⁷⁶ In fact, this number may actually *overestimate* African American broadcast ownership, as it appears KTGF was transferred to RGW Investments in 2010.

Table 2 – African American-Owned Commercial TV Stations by Owner

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
61111	WMGM	NBC	Wildwood	NJ	Philadelphia	4	Access.1 Communications
62293	KXVA	Fox	Abilene	TX	Abilene-Sweetwater	164	Bayou City Broadcasting LLC
58560	KIDY	Fox	San Angelo	TX	San Angelo	197	Bayou City Broadcasting LLC
13792	KTGF	license transferred to RGW Investments Sept. 28, 2010 ⁷⁷	Great Falls	MT	Great Falls	191	Density Licenses, LLC
32334	WJYS	not listed	Hammond	IN	Chicago	3	Oxford Media Group, Inc.
60793	KCHF	not listed	Santa Fe	NM	Albuquerque-Santa Fe	44	Roberts Broadcasting Cos.
136750	WZRB	CW	Columbia	SC	Columbia	81	Roberts Broadcasting Cos.
136749	WRBJ	CW	Magee	MS	Jackson	90	Roberts Broadcasting Cos.
29706	WHTV	MyNetworkTV	Jackson	MI	Lansing	112	Venture Technologies Group, LLC

B. Asian American-Owned Stations Are Rare in Markets with Large Asian-American Communities and Are Vulnerable to Market Consolidation

The FCC found that Asian-Americans also controlled nine stations, accounting for 0.6% of all commercial television stations. Yet, according to the 2010 Census, Americans who identify as Asian, either solely or in combination with one or more other races, totaled 17.3 million, or 5.6 percent of the national population.⁷⁸ The largest concentration of Asian Americans is in the

⁷⁷ See Destiny Licenses, LLC, Consummation Notice (filed Sept. 28, 2010), *available at* https://licensing.fcc.gov/cgi-bin/ws.exe/prod/cdbs/forms/prod/cdbsmenu.htm?context=25&appn=101400814&formid=905&fac_num=13792.

⁷⁸ Elizabeth M. Hoeffel, et al., *The Asian Population: 2010* 3 (Mar. 2012), *available at* <http://www.census.gov/prod/cen2010/briefs/c2010br-11.pdf>. Between 2000 and 2010, the population of Americans identifying as *solely* Asian increased “more than four times faster than the total U.S. population, growing by 43 percent from 10.2 million to 14.7 million.” *Id.*

Western United States; approximately 5.6 million live in California alone.⁷⁹ Yet, as shown in Table 3, only one station in California (KHIZ) is owned by Asian-Americans.

As with African-American-owned stations, Asian-American-owned stations are frequently located far outside the urban core of their respective DMAs. Although KHIZ is considered to be in the Los Angeles DMA, it is licensed to Barstow, California, which is situated approximately 100 miles away *and across a mountain range* from downtown Los Angeles. Similarly, two Asian-American-owned stations located in the New York DMA are licensed far outside the city limits. WMBC is licensed to Newton, New Jersey, over forty miles from downtown New York, and the WSAH is licensed to Bridgeport, Connecticut, which is also over forty miles from downtown New York. The remaining Asian-American-owned stations are located in Arizona, Arkansas, Hawai`i, Idaho, Iowa, and Wyoming. Although Asian-Americans own more “major market” stations relative to other minority groups, none of the Asian-American-owned stations appears to be affiliated with a top-4 network.

⁷⁹ *Id.* at 7–8.

Table 3 – Asian American-Owned Commercial TV Stations by DMA Rank							
Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
70493	WSAH	not listed	Bridgeport	CT	New York City	1	MTB Equity LLC
43952	WMBC	not listed	Newton	NJ	New York City	1	Mountain Broadcasting Corp.
63865	KHIZ	not listed	Barstow	CA	Los Angeles	2	LATV Partners LLC
35104	KCFG	Request for Silent STA filed Feb. 8, 2006 ⁸⁰	Flagstaff	AZ	Phoenix	12	KM Communications
35103	KBEO	license revoked Jul. 27, 2010 ⁸¹	Jackson	WY	Salt Lake City	35	KM Communications
65395	KBFD	not listed	Honolulu	HI	Honolulu	73	Allen Broadcasting Corp.
35096	KWKB	CW; MyNetworkTV	Iowa City	IA	Cedar Rapids-Waterloo-Iowa City-Dubuque	87	KM Communications
84164	KEJB	MyNetworkTV	El Dorado	AR	Monroe-El Dorado	136	KM Communications
86205	KPIF	CW	Pocatello	ID	Idaho Falls-Pocatello	163	KM Communications

Table 4 shows that in 2009, one company, KM Communications, owned five of the nine Asian-American-controlled stations. Two of these KM Communications stations (KCFG and KBEO) have since stopped broadcasting.

⁸⁰ See KM Television of Flagstaff, L.L.C., Notice of Suspension of Operations / Request for Silent STA (filed Feb. 8, 2008), *available at* https://licensing.fcc.gov/cgi-bin/ws.exe/prod/cdbs/forms/prod/cdbsmenu.htm?context=25&appn=101113864&formid=910&fac_num=35104.

⁸¹ See Letter from FCC to KBEO (Jul. 26, 2010), *available at* http://licensing.fcc.gov/cgi-bin/prod/cdbs/forms/prod/getimportletter_exh.cgi?import_letter_id=20601. After receiving KBEO's request for silent authority, the FCC dismissed the request and cancelled the station's license. *Id.*

Table 4 – Asian American-Owned Commercial TV Stations by Owner

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
65395	KBFD	not listed	Honolulu	HI	Honolulu	73	Allen Broadcasting Corp.
35104	KCFG	silent as of Dec. 2010	Flagstaff	AZ	Phoenix	12	KM Communications
35103	KBEO	FCC license revoked Jul. 27, 2010	Jackson	WY	Salt Lake City	35	KM Communications
35096	KWKB	CW; MyNetworkTV	Iowa City	IA	Cedar Rapids-Waterloo-Iowa City-Dubuque	87	KM Communications
84164	KEJB	MyNetworkTV	El Dorado	AR	Monroe-El Dorado	136	KM Communications
86205	KPIF	CW	Pocatello	ID	Idaho Falls-Pocatello	163	KM Communications
63865	KHIZ	not listed	Barstow	CA	Los Angeles	2	LATV Partners LLC
43952	WMBC	not listed	Newton	NJ	New York City	1	Mountain Broadcasting Corp.
70493	WSAH	not listed	Bridgeport	CT	New York City	1	MTB Bridgeport-NY Licensee LLC

C. Native Hawaiians or Pacific Islanders Control Only One Station and it Is Located in Guam

The FCC found that Native Hawaiian or Pacific Islanders own one station or 0.1% of the total. That station, KUAM, is licensed to Pacific Telestations Inc. and is affiliated with NBC and CBS. The station is located in Guam, which has a population of 159,358 and is not included in any DMA. None of the stations licensed to serve Hawai'i are controlled by Native Hawaiians, despite approximately 136,000 residents identifying as solely Hawaiian/Pacific Islander and an additional 320,000 Hawaiian residents identifying as mixed-race.⁸²

D. The Small Number of Native American-Owned Stations Are Controlled by an Even Smaller Number of Owners

The FCC found that American Indians or Alaskan Natives own ten stations, or 0.7% of the total. In comparison, Census data for 2010 shows that 5.2 million Americans, or 1.7 percent

⁸² See U.S. Census Bureau, *Hawaii Quickfacts from the US Census Bureau* (last visited Apr. 17, 2012), available at <http://quickfacts.census.gov/qfd/states/15000.html>.

of the total, identified as Native American/Alaska Native, either alone or in combination with other races.

The largest number of Native Americans live in the western United States; California has the highest Native American population (approximately 723,000) of any U.S. state.⁸³ Yet, as Table 5 shows, no Native Americans own stations in California.

Table 5 – Native American-Owned Commercial TV Stations by DMA Rank							
Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
49264	KFFV	not listed	Seattle	WA	Seattle-Tacoma	14	Northern Pacific International TV
43870	WRLM	not listed	Canton	OH	Cleveland-Akron	17	Tri-State Christian TV, Inc.
67781	WTLJ	not listed	Muskegon	MI	Grand Rapids-Kalamazoo-Battle Creek	39	Tri-State Christian TV, Inc.
25382	KWTV	CBS	Oklahoma City	OK	Oklahoma City	45	Griffin Communications, LLC
54452	WLXI	not listed	Greensboro	NC	Greensboro-High Point-Winston Salem	46	Tri-State Christian TV, Inc.
35434	KOTV	CBS	Tulsa	OK	Tulsa	60	Griffin Communications, LLC
78322	KQCW	CW	Muskogee	OK	Tulsa	60	Griffin Communications, LLC
67792	WAQP	not listed	Saginaw	MI	Flint-Saginaw-Bay City	66	Tri-State Christian TV, Inc.
67786	WTCT	not listed	Marion	IL	Paducah-Cape Girardeau-Harrisburg-Mt. Vernon	79	Tri-State Christian TV, Inc.
67787	WINM	not listed	Angolo	IN	Ft. Wayne	107	Tri-State Christian TV, Inc.

Table 6 shows that three entities control all of the Native American-owned stations. Six are controlled by Tri-State Christian TV (“TCT”).⁸⁴ TCT’s website states that “[f]or over thirty

⁸³ *Id.* at 7.

⁸⁴ TCT is family-owned, with each of five family members owning a twenty percent share. Garth Coonce, a Caucasian male, owns one share, as does his wife, Christina Coonce, a Native American woman. Each of their two daughters also owns a twenty percent share, as does Charles Payne, an unrelated Caucasian male. *See* Tri-State Christian TV, Inc., Ownership Report for Commercial Broadcast Stations (filed Jun. 30, 2010), *available at* https://licensing.fcc.gov/cdbs/cdbs_docs/ef/Form323/323_print/323_101.cfm?form=323_101.cfm&acct=0&appn=101383802&fac_num=67786&formid=322.

years, TCT has been committed to broadcasting the gospel.”⁸⁵ A review of TCT’s schedule indicates that all of its North American stations broadcast substantially the same programming.⁸⁶ Griffin Communications owns three stations, two of which are located in Tulsa, Oklahoma, and the third in Oklahoma City. Two of Griffin Communications’ stations are CBS affiliates and the other is a CW affiliate. Northern Pacific International owns KFFV, located in Seattle.

Table 6 – Native American-Owned Commercial TV Stations by Owner

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
25382	KWTV	CBS	Oklahoma City	OK	Oklahoma City	45	Griffin Communications, LLC
35434	KOTV	CBS	Tulsa	OK	Tulsa	60	Griffin Communications, LLC
78322	KQCW	CW	Muskogee	OK	Tulsa	60	Griffin Communications, LLC
49264	KFFV	not listed	Seattle	WA	Seattle-Tacoma	14	Northern Pacific International TV
43870	WRLM	not listed	Canton	OH	Cleveland-Akron	17	Tri-State Christian TV, Inc.
67781	WTLJ	not listed	Muskegon	MI	Grand Rapids-Kalamazoo-Battle Creek	39	Tri-State Christian TV, Inc.
54452	WLXI	not listed	Greensboro	NC	Greensboro-High Point-Winston Salem	46	Tri-State Christian TV, Inc.
67792	WAQP	not listed	Saginaw	MI	Flint-Saginaw-Bay City	66	Tri-State Christian TV, Inc.
67786	WTCT	not listed	Marion	IL	Paducah-Cape Girardeau-Harrisburg-Mt. Vernon	79	Tri-State Christian TV, Inc.
67787	WINM	not listed	Angolo	IN	Ft. Wayne	107	Tri-State Christian TV, Inc.

E. Many Large Hispanic Communities Lack Hispanic-Owned Broadcast Stations and Existing Hispanic Stations Are Vulnerable to Market Consolidation

The Commission found that Hispanic or Latino owners control thirty-six stations, or 2.6% of the total. Yet, 2010 Census data shows that approximately 50.5 million Americans

⁸⁵ TCT Television Network – About TCT (last visited Apr. 3, 2012), <http://www.tct.tv/about.php>.

⁸⁶ TCT Television Network – Program Schedule (last visited Apr. 3, 2012) (providing the broadcaster’s programming schedule for North America), <http://www.tct.tv/newschedule.php?start=1&a=1&stitle=North%20America>.

identify as Hispanic or Latino, constituting 16% of the U.S. population.⁸⁷ Hispanics are the single largest minority group in the United States and “[t]he Hispanic population grew in every region [of the United States] between 2000 and 2010.”⁸⁸ Of the thirty-six Hispanic-owned commercial television stations, fourteen are located in Puerto Rico. Table 7 shows that the fourteen stations in Puerto Rico are controlled by nine entities and provide predominantly religious programming. Puerto Rico’s population is approximately 3.7 million, 99% of whom are Hispanic.⁸⁹

Table 7 – Hispanic-Owned Commercial TV Stations in Puerto Rico by Owner

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
4077	WSJU	not listed	San Juan	PR	San Juan	n/a	Aerco Broadcasting Corp.
3001	WCCV	not listed	Arecibo	PR	Arecibo	n/a	Asociacion Evangelistica C.V.
67190	WVSN	not listed	Humacao	PR	not listed	n/a	Asociacion Evangelistica C.V.
3255	WQHA	not listed	Aguada	PR	Aguada	n/a	Catholic Church in Puerto Rico
73901	WORO	not listed	Fajardo	PR	Fajardo	n/a	Catholic Church in Puerto Rico
15320	WRUA	not listed	Fajardo	PR	Fajardo	n/a	Dr. Joseph Zavaletta
18410	WIDP	not listed	Guayama	PR	Guayama	n/a	Ebenezer Broadcasting Group
19561	WECN	not listed	Naranjito	PR	Naranjito	n/a	Encuentro Christian Network
28954	WTCV	not listed	San Juan	PR	San Juan	n/a	International Broadcasting Corp.
29000	WVOZ	not listed	Ponce	PR	Ponce	n/a	International Broadcasting Corp.
61573	WVEO	not listed	Aguadilla	PR	Aguadilla	n/a	International Broadcasting Corp.
54443	WRFB	not listed	Carolina	PR	Carolina	n/a	R & F Broadcasting, Inc.
4110	WDWL	not listed	Bayamon	PR	Bayamon	n/a	Teleadoracion Christian Network
64865	WORA	not listed	Mayaguez	PR	Mayaguez	n/a	Teleadoracion Christian Network

75% of all Hispanic Americans live in California, Texas, Florida, New York, Illinois, Arizona, New Jersey, and Colorado.⁹⁰ As shown in Table 8, sixteen of the twenty-two Hispanic-owned commercial television stations not located in Puerto Rico are located in California,

⁸⁷ Sharon R. Ennis, *The Hispanic Population: 2010 2* (2012), available at <http://www.census.gov/prod/cen2010/briefs/c2010br-04.pdf>.

⁸⁸ *Id.* at 4.

⁸⁹ *Id.* at 6.

⁹⁰ *Id.* at 5.

Arizona, New Mexico, Texas, and Florida. About half of the Hispanic-owned stations are located in the top twenty-five markets and four are located in the Los Angeles DMA alone. However, we were not able to determine whether these stations broadcast throughout the entire Los Angeles DMA. KVMD, for example, is licensed in Twentynine Palms, California, over 100 miles from downtown Los Angeles.

Even though Hispanic owners control more large market stations compared to other minority groups, many large DMAs with large Hispanic populations such as Chicago (Hispanic population approximately 1.96 million), Las Vegas (approximately 574,000), and Boston (approximately 554,000) still have *no* Hispanic-owned commercial television station. Only three of the Hispanic-owned stations are affiliated with one of the four major networks, and four are affiliated with Telemundo.

Table 8 – Hispanic-Owned Commercial TV Stations (Excluding Puerto Rico) by DMA Rank							
Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank	Owner
16729	KVMD	not listed	Twentynine Palms	CA	Los Angeles	2	KVMD TV, LLC
55083	KXLA	not listed	Rancho Palos Verdes	CA	Los Angeles	2	KXLA TV 44, Inc.
14000	KJLA	not listed	Ventura	CA	Los Angeles	2	LATV Holdings, LLC
22161	KRCA	not listed	Riverside	CA	Los Angeles	2	Lieberman Broadcasting Inc.
23142	WWSI	Telemundo	Atlantic City	NJ	Philadelphia	4	ZGS Broadcast Holdings, Inc.
29015	KFWD	not listed	Fort Worth	TX	Dallas-Ft. Worth	5	HERO Broadcasting Holdings
73701	KMPX	not listed	Decatur	TX	Dallas-Ft. Worth	5	Lieberman Broadcasting Inc.
69531	KZJL	not listed	Houston	TX	Houston	10	Lieberman Broadcasting Inc.
24753	KMOH	not listed	Kingman	AZ	Phoenix	12	HERO Broadcasting Holdings
27387	WGEN	not listed	Key West	FL	Miami-Ft. Lauderdale	16	Cumbia Entertainment LLC
72053	WSBS	not listed	Key West	FL	Miami-Ft. Lauderdale	16	Spanish Broadcasting System
77512	KPNZ	not listed	Ogden	UT	Salt Lake City	35	Lieberman Broadcasting Inc.
32621	KVAW	not listed	Eagle Pass	TX	San Antonio	37	Dr. Joseph Zavaletta
83945	KGLA	Telemundo	Hammond	LA	New Orleans	53	Mayavision, Inc.
62354	KTLM	Telemundo	Rio Grande City	TX	Harlingen-Weslaco-Brownsville-McAllen	88	Sunbelt Multimedia Company
36916	KTDO	Telemundo	Las Cruces	NM	El Paso	98	ZGS Broadcast Holdings, Inc.
74592	WAZE	CW	Madisonville	KY	Evansville	101	Raul Broadcasting Co.
25395	WFUP	Fox	Vanderbilt	MI	Traverse City-Cadillac	116	Cadillac Telecasting Co.
25396	WFQX	Fox	Cadillac	MI	Traverse City-Cadillac	116	Cadillac Telecasting Co.
56384	KBEH	not listed	Oxnard	CA	Santa Barbara-Santa Maria-San Luis Obispo	122	HERO Broadcasting Holdings
12930	KTAS	Telemundo	San Luis Obispo	CA	Santa Barbara-Santa Maria-San Luis Obispo	122	Raul and Consuelo Palazuelos
42640	KVIQ	CBS	Eureka	CA	Eureka	195	Raul Broadcasting Co.

Table 9 shows that the twenty-two Hispanic-owned stations on the mainland are controlled by thirteen owners. Lieberman Broadcasting has the most with five. According to TVNewsCheck, Lieberman is the sixteenth largest group owner with 11.2% coverage.⁹¹ All five

⁹¹ Kim McAvoy, *TV Group Ranking Could See Shake-Up in '11*, TVNewsCheck, Mar. 30, 2011, available at <http://www.tvnewscheck.com/article/2011/03/30/50206/tv-group-ranking-could-see-shakeup-in-11>.

full-power television stations carry Liberman’s Spanish-language network Estrella TV. In addition, Liberman operates low-power stations in New York, Chicago, Phoenix and San Diego. This fact suggests the importance of analyzing low power station ownership to obtain a complete snapshot of minority ownership.

Table 9 – Hispanic-Owned Commercial TV Stations (Excluding Puerto Rico) by Owner

Facility	Call Sign	Affiliation	City	State	DMA	2008-09	Owner
25395	WFUP	Fox	Vanderbilt	MI	Traverse City-Cadillac	116	Cadillac Telecasting Co.
25396	WFQX	Fox	Cadillac	MI	Traverse City-Cadillac	116	Cadillac Telecasting Co.
27387	WGEN	not listed	Key West	FL	Miami-Ft. Lauderdale	16	Cumbia Entertainment LLC
32621	KVAW	not listed	Eagle Pass	TX	San Antonio	37	Dr. Joseph Zavaletta
29015	KFWD	not listed	Fort Worth	TX	Dallas-Ft. Worth	5	HERO Broadcasting Holdings
24753	KMOH	not listed	Kingman	AZ	Phoenix	12	HERO Broadcasting Holdings
56384	KBEH	not listed	Oxnard	CA	Santa Barbara-Santa Maria-San Luis Obispo	122	HERO Broadcasting Holdings
16729	KVMD	not listed	Twentynine Palms	CA	Los Angeles	2	KVMD TV, LLC
55083	KXLA	not listed	Rancho Palos Verdes	CA	Los Angeles	2	KXLA TV 44, Inc.
14000	KJLA	not listed	Ventura	CA	Los Angeles	2	LATV Holdings, LLC
22161	KRCA	not listed	Riverside	CA	Los Angeles	2	Liberman Broadcasting Inc.
73701	KMPX	not listed	Decatur	TX	Dallas-Ft. Worth	5	Liberman Broadcasting Inc.
69531	KZJL	not listed	Houston	TX	Houston	10	Liberman Broadcasting Inc.
77512	KPNZ	not listed	Ogden	UT	Salt Lake City	35	Liberman Broadcasting Inc.
83945	KGLA	Telemundo	Hammond	LA	New Orleans	53	Mayavision, Inc.
12930	KTAS	Telemundo	San Luis Obispo	CA	Santa Barbara-Santa Maria-San Luis Obispo	122	Raul and Consuelo Palazuelos
74592	WAZE	CW	Madisonville	KY	Evansville	101	Raul Broadcasting Co.
42640	KVIQ	CBS	Eureka	CA	Eureka	195	Raul Broadcasting Co.
72053	WSBS	not listed	Key West	FL	Miami-Ft. Lauderdale	16	Spanish Broadcasting System
62354	KTLM	Telemundo	Rio Grande City	TX	Harlingen-Weslaco-Brownsville-McAllen	88	Sunbelt Multimedia Company

23142	WWSI	Telemundo	Atlantic City	NJ	Philadelphia	4	ZGS Broadcast Holdings, Inc.
36916	KTDO	Telemundo	Las Cruces	NM	El Paso	98	ZGS Broadcast Holdings, Inc.

F. Stations Designated as “No Controlling Interest” Are Licensed Mostly to Large Corporations

The Commission was “not able to categorize the race or ethnicity of the ownership for 244 stations, representing 17.5 percent of the total stations, because at least 50 percent of the ownership of these stations was not reportable via the Form 323.”⁹² Appendix A lists these 244 stations along with the name of their licensee or parent. Ninety-one are located in the top-25 DMAs.

We found that many stations designated “non-controlling interest” (“NCI”) are licensed to major group owners such as Broadcasting Media Partners (39 stations); Gray Television, LLC (34 stations); NBC Telemundo Co. (24 stations); and Gannett Corp. (23 stations).⁹³ To determine the race and gender of noncommercial licensees, the FCC has proposed to look at “the composition of the board of directors or other governing entity.”⁹⁴ Using this same criterion for NCIs, we found little racial or gender diversity on the boards of these corporations.

For example, the Form 323 filings from 2009 showed that Broadcasting Media Partners and Univision, which it owns, share the same officers and directors. Both companies had five officers and thirteen directors. All five officers were male; four were Caucasian and one was

⁹² NPRM at ¶ 156.

⁹³ See *infra* Appendices A–B.

⁹⁴ *Promoting Diversification of Ownership in the Broadcasting Services*, Report and Order and Fourth Further Notice of Proposed Rulemaking, MB Dkt. No. 07-294, 24 FCC Rcd. 5896, 5911 (2009).

Hispanic. Twelve of the thirteen directors were male. Eight were Caucasian, three Hispanic, and two identified as “two or more races.”⁹⁵

Form 323 filings from 2009 for Gray Television disclose that the company had five officers, three of whom also constituted the company’s board of directors. All five individuals were Caucasian; two were women. 2009 filings from NBC Telemundo disclose that the company had twenty-one officers, two of whom were also board members. Of the company’s twenty-one officers, only two were Hispanic, one was African American, and seven were women. Finally, 2009 filings submitted by Gannett disclosed ten directors and fourteen officers. Gannett had only two African American directors and only three female directors. Of Gannett’s fourteen officers, only one was African American; and seven were Caucasian males.

In sum, this detailed examination of the FCC data shows that the state of minority ownership is even worse than the numbers alone might indicate. Not only is the percentage of minority-owned stations far below the percentage of each group in the population, but most minority stations tend to be located either in small markets or on the fringes of larger markets and only a handful are affiliated with a major network. Moreover, many states and cities with large minority populations have no minority-owned stations.

IV. Conclusion

The sad state of minority television station ownership in 2009 highlights the need for the FCC to finish analyzing all of the 2009 and 2011 data before considering whether any further

⁹⁵ Univision Communications Inc., Ownership Report for Commercial Broadcast Stations (filed Jul. 8, 2010); Broadcast Media Partners Holdings, Inc., Ownership Report for Commercial Broadcast Stations (filed Jul. 23, 2010). Broadcasting Media Partners, in turn, is owned by an “investor group including Madison Dearborn Partners, Providence Equity Partners, TPG, Thomas H. Lee Partners, and Saban Capital Group.” Univision Press Release (Mar. 29, 2007), <http://corporate.univision.com/2007/press/broadcasting-media-partners-completes-acquisition-of-univision/>.

relaxation of the ownership limits would be in the public interest. The uncertainty created by the Spectrum Act also militates against further relaxation. However, the Commission should promptly adopt a rule attributing sharing arrangements that confer substantial influence. Such a rule will prevent circumvention of the local television rules, provide opportunities for new entrants, and protect the public interest in diversity, competition and localism.

Respectfully submitted,

/s/

Angela J. Campbell
Laura M. Moy*

Of counsel:

Chuck Coughlin
Benjamin Jacobs
Law Students
Georgetown Law

Institute for Public Representation
Georgetown Law
600 New Jersey Avenue, NW
Suite 312
Washington, DC 20001
(202) 662-9535

Filed: April 17, 2012

Counsel for United Church of Christ, et al.

* Admitted to the Maryland bar only; DC bar membership pending. Practice supervised by members of the DC bar.

Appendix A: Table 10 – No Controlling Interest Stations by DMA Rank

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank 2008-09	Owner
60555	WFUT	TeleFutura	Newark	NJ	New York City	1	Broadcasting Media Partners
74215	WXTV	Univision	Paterson	NJ	New York City	1	Broadcasting Media Partners
73333	WNJU	Telemundo	Linden	NJ	New York City	1	NBC Telemundo Co.
60553	WFTY	not listed	Smithtown	NY	New York City	1	Broadcasting Media Partners
47535	WNBC	NBC	New York	NY	New York City	1	NBC Telemundo Co.
73881	WPIX	CW	New York	NY	New York City	1	WPIX, Inc.
35123	KMEX	Univision	Los Angeles	CA	Los Angeles	2	Broadcasting Media Partners
60549	KFTR	TeleFutura	Ontario	CA	Los Angeles	2	Broadcasting Media Partners
35608	KSCI	not listed	Long Beach	CA	Los Angeles	2	KHLS, Inc.
35670	KTLA	CW	Los Angeles	CA	Los Angeles	2	KTLA Inc.
19783	KVEA	Telemundo	Corona	CA	Los Angeles	2	NBC Telemundo Co.
26231	KWHY	not listed	Los Angeles	CA	Los Angeles	2	NBC Telemundo Co.
47906	KNBC	NBC	Los Angeles	CA	Los Angeles	2	NBC Telemundo Co.
12498	WGBO	Univision	Joliet	IL	Chicago	3	Broadcasting Media Partners
60539	WXFT	TeleFutura	Aurora	IL	Chicago	3	Broadcasting Media Partners
47905	WMAQ	NBC	Chicago	IL	Chicago	3	NBC Telemundo Co.
70119	WSNS	Telemundo	Chicago	IL	Chicago	3	NBC Telemundo Co.
73226	WLS	ABC	Chicago	IL	Chicago	3	The Walt Disney Co.
72115	WGN	CW	Chicago	IL	Chicago	3	WGN Continental Broadcasting
60560	WUVP	Univision	Vineland	NJ	Philadelphia	4	Broadcasting Media Partners
63153	WCAU	NBC	Philadelphia	PA	Philadelphia	4	NBC Telemundo Co.
73879	WPHL	MyNetworkTV	Philadelphia	PA	Philadelphia	4	Tribune Broadcast, Inc.
35841	KUVN	Univision	Garland	TX	Dallas-Ft. Worth	5	Broadcasting Media Partners
60534	KSTR	TeleFutura	Irving	TX	Dallas-Ft. Worth	5	Broadcasting Media Partners
35994	KXTX	Telemundo	Dallas	TX	Dallas-Ft. Worth	5	NBC Telemundo Co.
49330	KXAS	NBC	Ft. Worth	TX	Dallas-Ft. Worth	5	Station Venture Operations, LP
22201	KDAF	CW	Dallas	TX	Dallas-Ft. Worth	5	Tribune Broadcast, Inc.
72054	WFAA	ABC	Dallas	TX	Dallas-Ft. Worth	5	WFAA-TV, Inc.
33778	KDTV	Univision	San Francisco	CA	San Francisco-Oakland-San	6	Broadcasting Media Partners

					Jose		
51429	KFSF	TeleFutura	Vallejo	CA	San Francisco-Oakland-San Jose	6	Broadcasting Media Partners
35280	KNTV	NBC	San Jose	CA	San Francisco-Oakland-San Jose	6	NBC Telemundo Co.
64987	KSTS	Telemundo	San Jose	CA	San Francisco-Oakland-San Jose	6	NBC Telemundo Co.
34470	KGO	ABC	San Francisco	CA	San Francisco-Oakland-San Jose	6	The Walt Disney Co.
60551	WUTF	TeleFutura	Marlborough	MA	Boston	7	Broadcasting Media Partners
23671	WWDP	not listed	Norwell	MA	Boston	7	Norwell Television, LLC
51864	WNEU	Telemundo	Merrimack	NH	Boston	7	NBC Telemundo Co.
48813	WUVG	Univision	Athens	GA	Atlanta	8	Broadcasting Media Partners
22819	WATL	MyNetworkTV	Atlanta	GA	Atlanta	8	Gannett Corp.
51163	WXIA	NBC	Atlanta	GA	Atlanta	8	Gannett Corp.
64033	WPCH	not listed	Atlanta	GA	Atlanta	8	Superstation, Inc.
65593	WUSA	CBS	Washington	DC	Washington, DC	9	Gannett Corp.
47904	WRC	NBC	Washington	DC	Washington, DC	9	NBC Telemundo Co.
30576	WDCW	CW	Washington	DC	Washington, DC	9	WDCW Broadcasting, Inc.
69532	WFDC	Univision	Arlington	VA	Washington, DC	9	Broadcasting Media Partners
53847	KXLN	Univision	Rosenberg	TX	Houston	10	Broadcasting Media Partners
60537	KFTH	TeleFutura	Alvin	TX	Houston	10	Broadcasting Media Partners
34529	KHOU	CBS	Houston	TX	Houston	10	KHOU-TV, Inc.
23394	KIAH	CW	Houston	TX	Houston	10	KIAH Inc.
64984	KTMD	Telemundo	Galveston	TX	Houston	10	NBC Telemundo Co.
35675	KTRK	ABC	Houston	TX	Houston	10	The Walt Disney Co.
41517	KFPH	TeleFutura	Flagstaff	AZ	Phoenix	12	Broadcasting Media Partners
24749	KNAZ	NBC	Flagstaff	AZ	Phoenix	12	Gannett Corp.
35486	KPNX	NBC	Mesa	AZ	Phoenix	12	Gannett Corp.
7143	KASW	CW	Phoenix	AZ	Phoenix	12	KASW-TV, Inc.
40993	KTVK	not listed	Phoenix	AZ	Phoenix	12	KTVK, Inc.
81458	KTAZ	Telemundo	Phoenix	AZ	Phoenix	12	NBC Telemundo Co.
60559	WFTT	TeleFutura	Tampa	FL	Tampa-St. Petersburg	13	Broadcasting Media Partners
11290	WTSP	CBS	St. Petersburg	FL	Tampa-St. Petersburg	13	Gannett Corp.
34847	KING	NBC	Seattle	WA	Seattle-Tacoma	14	King Broadcasting Co.

35396	KONG	not listed	Everett	WA	Seattle-Tacoma	14	Kong-TV, Inc.
33894	KCPQ	Fox	Tacoma	WA	Seattle-Tacoma	14	Tribune Broadcast, Inc.
69571	KZJO	not listed	Seattle	WA	Seattle-Tacoma	14	Tribune Broadcast, Inc.
23079	KARE	NBC	Minneapolis	MN	Minneapolis-St. Paul	15	Gannett Corp.
60536	WAMI	TeleFutura	Hollywood	FL	Miami-Ft. Lauderdale	16	Broadcasting Media Partners
73230	WLTW	Univision	Miami	FL	Miami-Ft. Lauderdale	16	Broadcasting Media Partners
10203	WSFL	CW	Miami	FL	Miami-Ft. Lauderdale	16	Channel 39, Inc.
63154	WTVJ	NBC	Miami	FL	Miami-Ft. Lauderdale	16	NBC Telemundo Co.
64971	WSCV	Telemundo	Ft. Lauderdale	FL	Miami-Ft. Lauderdale	16	NBC Telemundo Co.
60556	WQHS	Univision	Cleveland	OH	Cleveland-Akron	17	Broadcasting Media Partners
73195	WKYC	NBC	Cleveland	OH	Cleveland-Akron	17	Gannett Corp.
8532	WUAB	MyNetworkTV	Lorain	OH	Cleveland-Akron	17	WOIO, LLC
39746	WOIO	CBS	Shaker Heights	OH	Cleveland-Akron	17	WOIO, LLC
57219	KTFD	TeleFutura	Boulder	CO	Denver	18	Broadcasting Media Partners
23074	KUSA	NBC	Denver	CO	Denver	18	Gannett Corp.
68581	KTVB	MyNetworkTV	Denver	CO	Denver	18	Gannett Corp.
35883	KWGN	CW	Denver	CO	Denver	18	KWGN Inc.
40875	KMGH	ABC	Denver	CO	Denver	18	McGraw-Hill Broadcasting Co.
38375	KDEN	Telemundo	Longmont	CO	Denver	18	NBC Telemundo Co.
5802	WOTF	TeleFutura	Melbourne	FL	Orlando-Daytona Beach-Melbourne	19	Broadcasting Media Partners
20871	KTFK	TeleFutura	Stockton	CA	Sacramento-Stockton-Modesto	20	Broadcasting Media Partners
58609	KUVS	Univision	Modesto	CA	Sacramento-Stockton-Modesto	20	Broadcasting Media Partners
10205	KTXL	Fox	Sacramento	CA	Sacramento-Stockton-Modesto	20	Channel 40, Inc.
25048	KXTV	ABC	Sacramento	CA	Sacramento-Stockton-Modesto	20	Gannett Corp.
57221	WRBU	MyNetworkTV	East St. Louis	IL	St. Louis	21	Broadcasting Media Partners
46981	KSDK	NBC	St. Louis	MO	St. Louis	21	Gannett Corp.
70034	KMOV	CBS	St. Louis	MO	St. Louis	21	KMOV-TV, Inc.
35417	KPLR	CW	St. Louis	MO	St. Louis	21	KPLR, Inc.
34874	KGW	NBC	Portland	OR	Portland	23	King Broadcasting Co.
10192	KRCW	CW	Salem	OR	Portland	23	Tribune Broadcast, Inc.

30826	WBTV	CBS	Charlotte	NC	Charlotte	25	WBTV, LLC
32326	WCNC	NBC	Charlotte	NC	Charlotte	25	WCNC-TV, Inc.
40877	WRTV	ABC	Indianapolis	IN	Indianapolis	26	McGraw-Hill Broadcasting Co.
146	WXIN	Fox	Indianapolis	IN	Indianapolis	26	Tribune Broadcast, Inc.
56523	WTTV	CW	Bloomington	IN	Indianapolis	26	Tribune Broadcast, Inc.
56526	WTTK	CW	Kokomo	IN	Indianapolis	26	Tribune Broadcast, Inc.
58827	KSWB	Fox	San Diego	CA	San Diego	27	KSWB Inc.
40876	KGTV	ABC	San Diego	CA	San Diego	27	McGraw-Hill Broadcasting Co.
35277	KNSD	NBC	San Diego	CA	San Diego	27	Station Venture Operations, LP
16517	WUVC	Univision	Fayetteville	NC	Raleigh-Durham	28	Broadcasting Media Partners
8617	WTVD	ABC	Durham	NC	Raleigh-Durham	28	The Walt Disney Co.
74170	WVIT	NBC	New Britain	CT	Hartford & New Haven	29	NBC Telemundo Co.
147	WTIC	Fox	Hartford	CT	Hartford & New Haven	29	Tribune Broadcast, Inc.
14050	WCCT	not listed	Waterbury	CT	not listed	not listed	WTXX Inc.
39738	WXIX	Fox	Newport	KY	Cincinnati	33	WIXX Subsidiary, LLC
74098	WTMJ	NBC	Milwaukee	WI	Milwaukee	34	Journal Broadcast Corp.
6359	KSL	NBC	Salt Lake City	UT	Salt Lake City	35	Bonneville Holding Co.
81451	KUTH	Univision	Provo	UT	Salt Lake City	35	Broadcasting Media Partners
35881	KWEX	Univision	San Antonio	TX	San Antonio	37	Broadcasting Media Partners
26304	KENS	CBS	San Antonio	TX	San Antonio	37	KENS-TV, Inc.
64969	KVDA	Telemundo	San Antonio	TX	San Antonio	37	NBC Telemundo Co.
39736	WFLX	Fox	West Palm Beach	FL	West Palm Beach-Ft. Pierce	38	WFLX, LLC
49713	WZZM	ABC	Grand Rapids	MI	Grand Rapids- Kalamazoo- Battle Creek	39	Gannett Corp.
68433	WXMI	Fox	Grand Rapids	MI	Grand Rapids- Kalamazoo- Battle Creek	39	Tribune Broadcast, Inc.
10213	WPMT	Fox	York	PA	Harrisburg- Lancaster- Labanon-York	41	Tribune Broadcast, Inc.
74167	WVEC	ABC	Hampton	VA	Norfolk- Portsmouth- Newport News	42	WVEC Television, Inc.
74100	KTNV	ABC	Las Vegas	NV	Las Vegas	43	Journal Broadcast Corp.
63768	KBLR	Telemundo	Paradise	NV	Las Vegas	43	NBC Telemundo Co.
57220	KTFQ	TeleFutura	Albuquerque	NM	Albuquerque- Santa Fe	44	Broadcasting Media Partners
72064	WFMY	CBS	Greensboro	NC	Greensboro-High Point-Winston Salem	46	Gannett Corp.

19184	WMC	NBC	Memphis	TN	Memphis	47	WMC, LLC
32327	WHAS	ABC	Louisville	KY	Louisville	48	Belo Kentucky, Inc.
13989	WAVE	NBC	Louisville	KY	Louisville	48	WAVE, LLC
11893	WJXX	ABC	Orange Park	FL	Jacksonville	49	Gannett Corp.
65046	WTLV	NBC	Jacksonville	FL	Jacksonville	49	Gannett Corp.
64547	WGRZ	NBC	Buffalo	NY	Buffalo	50	Gannett Corp.
125710	KNIC	TeleFutura	Blanco	TX	Austin	51	Broadcasting Media Partners
35867	KVUE	ABC	Austin	TX	Austin	51	KVUE Television, Inc.
13938	WUPL	MyNetworkTV	Slidell	LA	New Orleans	53	Belo TV, Inc.
54280	WNOL	CW	New Orleans	LA	New Orleans	53	Tribune Broadcast, Inc.
72119	WGNO	ABC	New Orleans	LA	New Orleans	53	Tribune Broadcast, Inc.
74192	WWL	CBS	New Orleans	LA	New Orleans	53	WWI-TV, Inc.
34439	KFTV	Univision	Hanford	CA	Fresno-Visalia	55	Broadcasting Media Partners
58608	KNSO	Telemundo	Merced	CA	Fresno-Visalia	55	NBC Telemundo Co.
8620	KFSN	ABC	Fresno	CA	Fresno-Visalia	55	The Walt Disney Co.
2787	KTHV	CBS	Little Rock	AR	Little Rock-Pine Bluff	57	Gannett Corp.
46984	WBIR	NBC	Knoxville	TN	Knoxville	58	Gannett Corp.
35908	WVLT	CBS; MyNetworkTV	Knoxville	TN	Knoxville	58	Gray Television, LLC
19200	WTNZ	Fox	Knoxville	TN	Knoxville	58	WTNZ, LLC
10897	WUPV	CW	Ashland	VA	Richmond-Petersburg	59	Southeastern Media, Inc.
30833	WWBT	NBC	Richmond	VA	Richmond-Petersburg	59	WWBT, LLC
70649	WFTX	Fox	Cape Coral	FL	Ft. Myers-Naples	63	Journal Broadcast Corp.
24914	WKYT	CBS; CW	Lexington	KY	Lexington	64	Gray Television, LLC
24915	WYMT	CBS	Hazard	KY	Lexington	64	Gray Television, LLC
36912	WSAZ	NBC; MyNetworkTV	Huntington	WV	Charleston-Huntington	65	Gray Television, LLC
21735	WJRT	ABC	Flint	MI	Flint-Saginaw-Bay City	66	The Walt Disney Co.
63927	KUVE	Univision	Green Valley	AZ	Tucson	68	Broadcasting Media Partners
81441	KFTU	TeleFutura	Douglas	AZ	Tucson	68	Broadcasting Media Partners
35095	KWBA	CW	Sierra Vista	AZ	Tucson	68	Journal Broadcast Corp.
36918	KGUN	ABC	Tucson	AZ	Tucson	68	Journal Broadcast Corp.
44052	KMSB	Fox	Tucson	AZ	Tucson	68	KMSB-TV, Inc.
48663	KOLD	CBS	Tucson	AZ	Tucson	68	Kold Subsidiary, LLC
11908	KTTU	MyNetworkTV	Tucson	AZ	Tucson	68	KTTU-TV, Inc.
30601	KHRR	Telemundo	Tucson	AZ	Tucson	68	NBC Telemundo Co.
65522	KAKE	ABC	Wichita	KS	Wichita-Hutchinson	69	Gray Television, LLC

65523	KLBY	ABC	Colby	KS	Wichita-Hutchinson	69	Gray Television, LLC
65535	KUPK	ABC	Garden City	KS	Wichita-Hutchinson	69	Gray Television, LLC
2708	WGBA	NBC	Green Bay	WI	Green Bay-Appleton	70	Journal Broadcast Corp.
9635	WFRV	CBS	Green Bay	WI	Green Bay-Appleton	70	WFRV and WJMN TV Station, Inc.
74150	WTVG	ABC	Toledo	OH	Toledo	72	The Walt Disney Co.
13992	WTOL	CBS	Toledo	OH	Toledo	72	WTOL, LLC
36914	KGMD	CBS	Hilo	HI	Honolulu	73	HiTV Subsidiary, Inc.
36917	KFVE	MyNetworkTV	Honolulu	HI	Honolulu	73	HiTV Subsidiary, Inc.
36920	KGMV	CBS	Wailuku	HI	Honolulu	73	HiTV Subsidiary, Inc.
34527	KIKU	not listed	Honolulu	HI	Honolulu	73	KHLS, Inc.
34445	KGMB	CBS	Honolulu	HI	Honolulu	73	KHNL/KGMB, LLC
34867	KHNL	NBC	Honolulu	HI	Honolulu	73	KHNL/KGMB, LLC
65528	WOWT	NBC	Omaha	NE	Omaha	75	Gray Television, LLC
35190	KMTV	CBS	Omaha	NE	Omaha	75	Journal Broadcast Corp.
39664	WCSH	NBC	Portland	ME	Portland-Auburn	76	Gannett Corp.
34868	KREM	CBS	Spokane	WA	Spokane	77	King Broadcasting Co.
35606	KSKN	CW	Spokane	WA	Spokane	77	KSKN Television, Inc.
592	KFVS	CBS	Cape Girardeau	MO	Paducah-Cape Girardeau-Harrisburg-Mt. Vernon	79	KFVS Subsidiary, LLC
37176	WLTX	CBS	Columbia	SC	Columbia	81	Gannett Corp.
13990	WIS	NBC	Columbia	SC	Columbia	81	WIS, LLC
70482	KSLA	CBS	Shreveport	LA	Shreveport	82	KSLA Subsidiary, LLC
591	WAFF	NBC	Huntsville	AL	Huntsville-Decatur	83	Waff Subsidiary, LLC
6870	WMTV	NBC	Madison	WI	Madison	85	Gray Television, LLC
41674	WNDU	NBC	South Bend	IN	South Bend-Elkhart	89	Gray Television, LLC
68542	WLBT	NBC	Jackson	MS	Jackson	90	WLBT, LLC
35037	KKTV	CBS; MyNetworkTV	Colorado Springs	CO	Colorado Springs-Pueblo	93	Gray Television, LLC
589	WAFB	CBS	Baton Rouge	LA	Baton Rouge	94	WAFB, LLC
148	KAKW	Univision	Killeen	TX	Waco-Temple-Bryan	95	Broadcasting Media Partners
6669	KBTX	CBS; CW	Bryan	TX	Waco-Temple-Bryan	95	Gray Television, LLC
35903	KWTX	CBS; CW	Waco	TX	Waco-Temple-Bryan	95	Gray Television, LLC
590	WTOC	CBS	Savannah	GA	Savannah	97	WTOC, LLC
71297	WCSC	CBS	Charleston	SC	Charleston	100	WCSC LLC
13991	WFIE	NBC	Evansville	IN	Evansville	101	WFIE, LLC
83969	WMBF	NBC	Myrtle Beach	SC	Myrtle Beach-Florence	103	WMBF, LLC

7890	KOLN	CBS; MyNetworkTV	Lincoln	NE	Lincoln & Hastings- Kearney	104	Gray Television, LLC
7894	KGIN	CBS; MyNetworkTV	Grand Island	NE	Lincoln & Hastings- Kearney	104	Gray Television, LLC
594	WITN	NBC	Washington	NC	Greenville-New Bern- Washington	105	Gray Television, LLC
28155	WSWG	CBS; MyNetworkTV	Valdosta	GA	Tallahassee- Thomasville	108	Gray Television, LLC
31590	WCTV	CBS; MyNetworkTV	Thomasville	GA	Tallahassee- Thomasville	108	Gray Television, LLC
63331	KOLO	ABC	Reno	NV	Reno	110	Gray Television, LLC
68540	KLTV	ABC	Tyler	TX	Tyler-Longview	111	KITV/KTRE, LLC
68541	KTRE	ABC	Lufkin	TX	Tyler-Longview	111	KITV/KTRE, LLC
6863	WILX	NBC	Onondaga	MI	Lansing	112	Gray Television, LLC
74094	WSYM	Fox	Lansing	MI	Lansing	112	Journal Broadcast Corp.
59255	KIVI	ABC	Nampa	ID	Boise	113	Journal Broadcast Corp.
34858	KTVB	NBC	Boise	ID	Boise	113	King Broadcasting Co.
59363	KNIN	CW	Caldwell	ID	Boise	113	Meissner Trust
73937	WRDW	CBS; MyNetworkTV	Augusta	GA	Augusta	115	Gray Television, LLC
3228	WFXG	Fox	Augusta	GA	Augusta	115	Southeastern Media, Inc.
13993	WSFA	NBC	Montgomery	AL	Montgomery- Selma	118	WSFA, LLC
46991	WMAZ	CBS	Macon	GA	Macon	121	Gannett Corp.
7700	KUVI	MyNetworkTV	Bakersfield	CA	Bakersfield	125	Broadcasting Media Partners
40878	KERO	ABC	Bakerfield	CA	Bakersfield	125	McGraw-Hill Broadcasting Co.
7893	WEAU	NBC	Eau Claire	WI	La Crosse-Eau Claire	127	Gray Television, LLC
12472	WXTX	Fox	Columbus	GA	Columbus	128	Southeastern Media, Inc.
595	WTVM	ABC	Columbus	GA	Columbus	128	WTVM, LLC
4689	WIFR	CBS	Freeport	IL	Rockford	132	Gray Television, LLC
6867	WSAW	CBS; MyNetworkTV	Wausau	WI	Wausau- Rhineland	134	Gray Television, LLC
72871	WSFX	Fox	Wilmington	NC	Wilmington	135	Southeastern Media, Inc.
48666	WECT	NBC	Wilmington	NC	Wilmington	135	WECT, LLC
63160	WIBW	CBS; MyNetworkTV	Topeka	KS	Topeka	139	Gray Television, LLC
16749	KMIR	NBC	Palm Springs	CA	Palm Springs	144	Journal Broadcast Corp.
70713	WALB	NBC	Albany	GA	Albany	146	Walb Subsidiary, LLC
27507	KCBD	NBC	Lubbock	TX	Lubbock	148	KCBD Subsidiary, LLC
39644	WLBS	NBC	Bangor	ME	Bangor	152	Gannett Corp.

73136	WJHG	NBC; CW; MyNetworkTV	Panama City	FL	Panama City	154	Gray Television, LLC
2942	WPGX	Fox	Panama City	FL	Panama City	154	WPGX, LLC
13995	WLOX	ABC	Biloxi	MS	Biloxi-Gulfport	160	WLOX, LLC
35954	KXII	CBS; Fox; MyNetworkTV	Sherman	TX	Sherman-Ada	161	Gray Television, LLC
21250	WDAM	NBC	Laurel	MS	Hattiesburg- Laurel	168	WDAM, LLC
4152	WTVY	CBS; CW; MyNetworkTV	Dothan	AL	Dothan	172	Gray Television, LLC
32851	WDFX	Fox	Ozark	AL	Dothan	172	WDFX, LLC
13994	KPLC	NBC	Lake Charles	LA	Lake Charles	176	KPLC, LLC
4688	WHSV	ABC; Fox; MyNetworkTV	Harrisonburg	VA	Harrisonburg	178	Gray Television, LLC
9630	WJMN	CBS	Escanaba	MI	Marquette	179	WFRV and WJMN TV Station, Inc.
363	WCAV	CBS	Charlottesville	VA	Charlottesville	181	Gray Television, LLC
13988	KAIT	ABC	Jonesboro	AR	Jonesboro	182	KAIT Subsidiary, LLC
4692	WBKO	ABC; CW; Fox	Bowling Green	KY	Bowling Green	183	Gray Television, LLC
4686	WTOK	ABC; CW; Fox	Meridian	MS	Meridian	186	Gray Television, LLC
24766	KKCO	NBC; CW	Grand Junction	CO	Grand Junction- Montrose	187	Gray Television, LLC
4685	WTAP	NBC; Fox; MyNetworkTV	Parkersburg	WV	Parkersburg	190	Gray Television, LLC
19776	WSUR	Univision	Ponce	PR	Ponce	n/a	Broadcasting Media Partners
19777	WLII	not listed	Caguas	PR	Caguas	n/a	Broadcasting Media Partners
60341	WSTE	not listed	Ponce	PR	Ponce	n/a	Broadcasting Media Partners
26676	WMEI	not listed	Arecibo	PR	Arecibo	n/a	CMCG LLC
60357	WOST	not listed	Mayaguez	PR	Mayaguez	n/a	CMCG LLC
64983	WKAQ	Telemundo	San Juan	PR	San Juan	n/a	NBC Telemundo Co.
71725	WOLE	not listed	Aguadilla	PR	Aguadilla	n/a	Western Broadcasting Corp.
3113	WVXF	CBS	Charlotte Amalie	VI	Charlotte Amalie	n/a	Storefront Television, LLC
83304	WCVI	CW	Christiansted	VI	Christiansted	n/a	Virgin Blue, Inc.

Appendix B: Table 11 – No Controlling Interest Stations by Owner

Facility	Call Sign	Affiliation	City	State	DMA	DMA Rank 2008-09	Owner
32327	WHAS	ABC	Louisville	KY	Louisville	48	Belo Kentucky, Inc.
13938	WUPL	MyNetworkTV	Slidell	LA	New Orleans	53	Belo TV, Inc.
6359	KSL	NBC	Salt Lake City	UT	Salt Lake City	35	Bonneville Holding Co.
60555	WFUT	TeleFutura	Newark	NJ	New York City	1	Broadcasting Media Partners
74215	WXTV	Univision	Paterson	NJ	New York City	1	Broadcasting Media Partners
60553	WFTY	not listed	Smithtown	NY	New York City	1	Broadcasting Media Partners
35123	KMEX	Univision	Los Angeles	CA	Los Angeles	2	Broadcasting Media Partners
60549	KFTR	TeleFutura	Ontario	CA	Los Angeles	2	Broadcasting Media Partners
12498	WGBO	Univision	Joliet	IL	Chicago	3	Broadcasting Media Partners
60539	WXFT	TeleFutura	Aurora	IL	Chicago	3	Broadcasting Media Partners
60560	WUVP	Univision	Vineland	NJ	Philadelphia	4	Broadcasting Media Partners
35841	KUVN	Univision	Garland	TX	Dallas-Ft. Worth	5	Broadcasting Media Partners
60534	KSTR	TeleFutura	Irving	TX	Dallas-Ft. Worth	5	Broadcasting Media Partners
33778	KDTV	Univision	San Francisco	CA	San Francisco-Oakland-San Jose	6	Broadcasting Media Partners
51429	KFSF	TeleFutura	Vallejo	CA	San Francisco-Oakland-San Jose	6	Broadcasting Media Partners
60551	WUTF	TeleFutura	Marlborough	MA	Boston	7	Broadcasting Media Partners
48813	WUVG	Univision	Athens	GA	Atlanta	8	Broadcasting Media Partners
69532	WFDC	Univision	Arlington	VA	Washington, DC	9	Broadcasting Media Partners
53847	KXLN	Univision	Rosenberg	TX	Houston	10	Broadcasting Media Partners
60537	KFTH	TeleFutura	Alvin	TX	Houston	10	Broadcasting Media Partners
41517	KFPH	TeleFutura	Flagstaff	AZ	Phoenix	12	Broadcasting Media Partners
60559	WFTT	TeleFutura	Tampa	FL	Tampa-St. Petersburg	13	Broadcasting Media Partners
60536	WAMI	TeleFutura	Hollywood	FL	Miami-Ft. Lauderdale	16	Broadcasting Media Partners
73230	WLTW	Univision	Miami	FL	Miami-Ft.	16	Broadcasting Media

					Lauderdale		Partners
60556	WQHS	Univision	Cleveland	OH	Cleveland-Akron	17	Broadcasting Media Partners
57219	KTFD	TeleFutura	Boulder	CO	Denver	18	Broadcasting Media Partners
5802	WOTF	TeleFutura	Melbourne	FL	Orlando-Daytona Beach-Melbourne	19	Broadcasting Media Partners
20871	KTFK	TeleFutura	Stockton	CA	Sacramento-Stockton-Modesto	20	Broadcasting Media Partners
58609	KUVS	Univision	Modesto	CA	Sacramento-Stockton-Modesto	20	Broadcasting Media Partners
57221	WRBU	MyNetworkTV	East St. Louis	IL	St. Louis	21	Broadcasting Media Partners
16517	WUVC	Univision	Fayetteville	NC	Raleigh-Durham	28	Broadcasting Media Partners
81451	KUTH	Univision	Provo	UT	Salt Lake City	35	Broadcasting Media Partners
35881	KWEX	Univision	San Antonio	TX	San Antonio	37	Broadcasting Media Partners
57220	KTFQ	TeleFutura	Albuquerque	NM	Albuquerque-Santa Fe	44	Broadcasting Media Partners
125710	KNIC	TeleFutura	Blanco	TX	Austin	51	Broadcasting Media Partners
34439	KFTV	Univision	Hanford	CA	Fresno-Visalia	55	Broadcasting Media Partners
63927	KUVE	Univision	Green Valley	AZ	Tucson	68	Broadcasting Media Partners
81441	KFTU	TeleFutura	Douglas	AZ	Tucson	68	Broadcasting Media Partners
148	KAKW	Univision	Killeen	TX	Waco-Temple-Bryan	95	Broadcasting Media Partners
7700	KUVI	MyNetworkTV	Bakersfield	CA	Bakersfield	125	Broadcasting Media Partners
19776	WSUR	Univision	Ponce	PR	Ponce	n/a	Broadcasting Media Partners
19777	WLII	not listed	Caguas	PR	Caguas	n/a	Broadcasting Media Partners
60341	WSTE	not listed	Ponce	PR	Ponce	n/a	Broadcasting Media Partners
10203	WSFL	CW	Miami	FL	Miami-Ft. Lauderdale	16	Channel 39, Inc.
10205	KTXL	Fox	Sacramento	CA	Sacramento-Stockton-Modesto	20	Channel 40, Inc.
26676	WMEI	not listed	Arecibo	PR	Arecibo	n/a	CMCG LLC
60357	WOST	not listed	Mayaguez	PR	Mayaguez	n/a	CMCG LLC
22819	WATL	MyNetworkTV	Atlanta	GA	Atlanta	8	Gannett Corp.
51163	WXIA	NBC	Atlanta	GA	Atlanta	8	Gannett Corp.
65593	WUSA	CBS	Washington	DC	Washington, DC	9	Gannett Corp.
24749	KNAZ	NBC	Flagstaff	AZ	Phoenix	12	Gannett Corp.

35486	KPNX	NBC	Mesa	AZ	Phoenix	12	Gannett Corp.
11290	WTSP	CBS	St. Petersburg	FL	Tampa-St. Petersburg	13	Gannett Corp.
23079	KARE	NBC	Minneapolis	MN	Minneapolis-St. Paul	15	Gannett Corp.
73195	WKYC	NBC	Cleveland	OH	Cleveland-Akron	17	Gannett Corp.
23074	KUSA	NBC	Denver	CO	Denver	18	Gannett Corp.
68581	KTVD	MyNetworkTV	Denver	CO	Denver	18	Gannett Corp.
25048	KXTV	ABC	Sacramento	CA	Sacramento-Stockton-Modesto	20	Gannett Corp.
46981	KSDK	NBC	St. Louis	MO	St. Louis	21	Gannett Corp.
49713	WZZM	ABC	Grand Rapids	MI	Grand Rapids-Kalamazoo-Battle Creek	39	Gannett Corp.
72064	WFMY	CBS	Greensboro	NC	Greensboro-High Point-Winston Salem	46	Gannett Corp.
11893	WJXX	ABC	Orange Park	FL	Jacksonville	49	Gannett Corp.
65046	WTLV	NBC	Jacksonville	FL	Jacksonville	49	Gannett Corp.
64547	WGRZ	NBC	Buffalo	NY	Buffalo	50	Gannett Corp.
2787	KTHV	CBS	Little Rock	AR	Little Rock-Pine Bluff	57	Gannett Corp.
46984	WBIR	NBC	Knoxville	TN	Knoxville	58	Gannett Corp.
39664	WCSH	NBC	Portland	ME	Portland-Auburn	76	Gannett Corp.
37176	WLTX	CBS	Columbia	SC	Columbia	81	Gannett Corp.
46991	WMAZ	CBS	Macon	GA	Macon	121	Gannett Corp.
39644	WLBZ	NBC	Bangor	ME	Bangor	152	Gannett Corp.
35908	WVLT	CBS; MyNetworkTV	Knoxville	TN	Knoxville	58	Gray Television, LLC
24914	WKYT	CBS; CW	Lexington	KY	Lexington	64	Gray Television, LLC
24915	WYMT	CBS	Hazard	KY	Lexington	64	Gray Television, LLC
36912	WSAZ	NBC; MyNetworkTV	Huntington	WV	Charleston-Huntington	65	Gray Television, LLC
65522	KAKE	ABC	Wichita	KS	Wichita-Hutchinson	69	Gray Television, LLC
65523	KLBY	ABC	Colby	KS	Wichita-Hutchinson	69	Gray Television, LLC
65535	KUPK	ABC	Garden City	KS	Wichita-Hutchinson	69	Gray Television, LLC
65528	WOWT	NBC	Omaha	NE	Omaha	75	Gray Television, LLC
6870	WMTV	NBC	Madison	WI	Madison	85	Gray Television, LLC
41674	WNDU	NBC	South Bend	IN	South Bend-Elkhart	89	Gray Television, LLC
35037	KKTV	CBS; MyNetworkTV	Colorado Springs	CO	Colorado Springs-Pueblo	93	Gray Television, LLC
6669	KBTX	CBS; CW	Bryan	TX	Waco-Temple-Bryan	95	Gray Television, LLC
35903	KWTX	CBS; CW	Waco	TX	Waco-Temple-	95	Gray Television, LLC

					Bryan		
7890	KOLN	CBS; MyNetworkTV	Lincoln	NE	Lincoln & Hastings- Kearney	104	Gray Television, LLC
7894	KGIN	CBS; MyNetworkTV	Grand Island	NE	Lincoln & Hastings- Kearney	104	Gray Television, LLC
594	WITN	NBC	Washington	NC	Greenville-New Bern-Washington	105	Gray Television, LLC
28155	WSWG	CBS; MyNetworkTV	Valdosta	GA	Tallahassee- Thomasville	108	Gray Television, LLC
31590	WCTV	CBS; MyNetworkTV	Thomasville	GA	Tallahassee- Thomasville	108	Gray Television, LLC
63331	KOLO	ABC	Reno	NV	Reno	110	Gray Television, LLC
6863	WILX	NBC	Onondaga	MI	Lansing	112	Gray Television, LLC
73937	WRDW	CBS; MyNetworkTV	Augusta	GA	Augusta	115	Gray Television, LLC
7893	WEAU	NBC	Eau Claire	WI	La Crosse-Eau Claire	127	Gray Television, LLC
4689	WIFR	CBS	Freeport	IL	Rockford	132	Gray Television, LLC
6867	WSAW	CBS; MyNetworkTV	Wausau	WI	Wausau- Rhinelanders	134	Gray Television, LLC
63160	WIBW	CBS; MyNetworkTV	Topeka	KS	Topeka	139	Gray Television, LLC
73136	WJHG	NBC; CW; MyNetworkTV	Panama City	FL	Panama City	154	Gray Television, LLC
35954	KXII	CBS; Fox; MyNetworkTV	Sherman	TX	Sherman-Ada	161	Gray Television, LLC
4152	WTVY	CBS; CW; MyNetworkTV	Dothan	AL	Dothan	172	Gray Television, LLC
4688	WHSV	ABC; Fox; MyNetworkTV	Harrisonburg	VA	Harrisonburg	178	Gray Television, LLC
363	WCAV	CBS	Charlottesville	VA	Charlottesville	181	Gray Television, LLC
4692	WBKO	ABC; CW; Fox	Bowling Green	KY	Bowling Green	183	Gray Television, LLC
4686	WTOK	ABC; CW; Fox	Meridian	MS	Meridian	186	Gray Television, LLC
24766	KKCO	NBC; CW	Grand Junction	CO	Grand Junction- Montrose	187	Gray Television, LLC
4685	WTAP	NBC; Fox; MyNetworkTV	Parkersburg	WV	Parkersburg	190	Gray Television, LLC
36914	KGMD	CBS	Hilo	HI	Honolulu	73	HiTV Subsidiary, Inc.
36917	KFVE	MyNetworkTV	Honolulu	HI	Honolulu	73	HiTV Subsidiary, Inc.
36920	KGMV	CBS	Wailuku	HI	Honolulu	73	HiTV Subsidiary, Inc.
74098	WTMJ	NBC	Milwaukee	WI	Milwaukee	34	Journal Broadcast Corp.
74100	KTNV	ABC	Las Vegas	NV	Las Vegas	43	Journal Broadcast Corp.
70649	WFTX	Fox	Cape Coral	FL	Ft. Myers-Naples	63	Journal Broadcast Corp.
35095	KWBA	CW	Sierra Vista	AZ	Tucson	68	Journal Broadcast Corp.
36918	KGUN	ABC	Tucson	AZ	Tucson	68	Journal Broadcast Corp.
2708	WGBA	NBC	Green Bay	WI	Green Bay- Appleton	70	Journal Broadcast Corp.

35190	KMTV	CBS	Omaha	NE	Omaha	75	Journal Broadcast Corp.
74094	WSYM	Fox	Lansing	MI	Lansing	112	Journal Broadcast Corp.
59255	KIVI	ABC	Nampa	ID	Boise	113	Journal Broadcast Corp.
16749	KMIR	NBC	Palm Springs	CA	Palm Springs	144	Journal Broadcast Corp.
13988	KAIT	ABC	Jonesboro	AR	Jonesboro	182	KAIT Subsidiary, LLC
7143	KASW	CW	Phoenix	AZ	Phoenix	12	KASW-TV, Inc.
27507	KCBD	NBC	Lubbock	TX	Lubbock	148	KCBD Subsidiary, LLC
26304	KENS	CBS	San Antonio	TX	San Antonio	37	KENS-TV, Inc.
592	KFVS	CBS	Cape Girardeau	MO	Paducah-Cape Girardeau-Harrisburg-Mt. Vernon	79	KFVS Subsidiary, LLC
35608	KSCI	not listed	Long Beach	CA	Los Angeles	2	KHLS, Inc.
34527	KIKU	not listed	Honolulu	HI	Honolulu	73	KHLS, Inc.
34445	KGMB	CBS	Honolulu	HI	Honolulu	73	KHNL/KGMB, LLC
34867	KHNL	NBC	Honolulu	HI	Honolulu	73	KHNL/KGMB, LLC
34529	KHOU	CBS	Houston	TX	Houston	10	KHOU-TV, Inc.
23394	KIAH	CW	Houston	TX	Houston	10	KIAH Inc.
34847	KING	NBC	Seattle	WA	Seattle-Tacoma	14	King Broadcasting Co.
34874	KGW	NBC	Portland	OR	Portland	23	King Broadcasting Co.
34868	KREM	CBS	Spokane	WA	Spokane	77	King Broadcasting Co.
34858	KTVB	NBC	Boise	ID	Boise	113	King Broadcasting Co.
68540	KLTV	ABC	Tyler	TX	Tyler-Longview	111	KITV/KTRE, LLC
68541	KTRE	ABC	Lufkin	TX	Tyler-Longview	111	KITV/KTRE, LLC
70034	KMOV	CBS	St. Louis	MO	St. Louis	21	KMOV-TV, Inc.
44052	KMSB	Fox	Tucson	AZ	Tucson	68	KMSB-TV, Inc.
48663	KOLD	CBS	Tucson	AZ	Tucson	68	Kold Subsidiary, LLC
35396	KONG	not listed	Everett	WA	Seattle-Tacoma	14	Kong-TV, Inc.
13994	KPLC	NBC	Lake Charles	LA	Lake Charles	176	KPLC, LLC
35417	KPLR	CW	St. Louis	MO	St. Louis	21	KPLR, Inc.
35606	KSKN	CW	Spokane	WA	Spokane	77	KSKN Television, Inc.
70482	KSLA	CBS	Shreveport	LA	Shreveport	82	KSLA Subsidiary, LLC
58827	KSWB	Fox	San Diego	CA	San Diego	27	KSWB Inc.
35670	KTLA	CW	Los Angeles	CA	Los Angeles	2	KTLA Inc.
11908	KTTU	MyNetworkTV	Tucson	AZ	Tucson	68	KTTU-TV, Inc.
40993	KTVK	not listed	Phoenix	AZ	Phoenix	12	KTVK, Inc.
35867	KVUE	ABC	Austin	TX	Austin	51	KVUE Television, Inc.
35883	KWGN	CW	Denver	CO	Denver	18	KWGN Inc.
40875	KMGH	ABC	Denver	CO	Denver	18	McGraw-Hill Broadcasting Co.
40877	WRTV	ABC	Indianapolis	IN	Indianapolis	26	McGraw-Hill Broadcasting Co.
40876	KGTV	ABC	San Diego	CA	San Diego	27	McGraw-Hill Broadcasting Co.

40878	KERO	ABC	Bakerfield	CA	Bakersfield	125	McGraw-Hill Broadcasting Co.
59363	KNIN	CW	Caldwell	ID	Boise	113	Meissner Trust
73333	WNJU	Telemundo	Linden	NJ	New York City	1	NBC Telemundo Co.
47535	WNBC	NBC	New York	NY	New York City	1	NBC Telemundo Co.
19783	KVEA	Telemundo	Corona	CA	Los Angeles	2	NBC Telemundo Co.
26231	KWHY	not listed	Los Angeles	CA	Los Angeles	2	NBC Telemundo Co.
47906	KNBC	NBC	Los Angeles	CA	Los Angeles	2	NBC Telemundo Co.
47905	WMAQ	NBC	Chicago	IL	Chicago	3	NBC Telemundo Co.
70119	WSNS	Telemundo	Chicago	IL	Chicago	3	NBC Telemundo Co.
63153	WCAU	NBC	Philadelphia	PA	Philadelphia	4	NBC Telemundo Co.
35994	KXTX	Telemundo	Dallas	TX	Dallas-Ft. Worth	5	NBC Telemundo Co.
35280	KNTV	NBC	San Jose	CA	San Francisco- Oakland-San Jose	6	NBC Telemundo Co.
64987	KSTS	Telemundo	San Jose	CA	San Francisco- Oakland-San Jose	6	NBC Telemundo Co.
51864	WNEU	Telemundo	Merrimack	NH	Boston	7	NBC Telemundo Co.
47904	WRC	NBC	Washington	DC	Washington, DC	9	NBC Telemundo Co.
64984	KTMD	Telemundo	Galveston	TX	Houston	10	NBC Telemundo Co.
81458	KTAZ	Telemundo	Phoenix	AZ	Phoenix	12	NBC Telemundo Co.
63154	WTVJ	NBC	Miami	FL	Miami-Ft. Lauderdale	16	NBC Telemundo Co.
64971	WSCV	Telemundo	Ft. Lauderdale	FL	Miami-Ft. Lauderdale	16	NBC Telemundo Co.
38375	KDEN	Telemundo	Longmont	CO	Denver	18	NBC Telemundo Co.
74170	WVIT	NBC	New Britain	CT	Hartford & New Haven	29	NBC Telemundo Co.
64969	KVDA	Telemundo	San Antonio	TX	San Antonio	37	NBC Telemundo Co.
63768	KBLR	Telemundo	Paradise	NV	Las Vegas	43	NBC Telemundo Co.
58608	KNSO	Telemundo	Merced	CA	Fresno-Visalia	55	NBC Telemundo Co.
30601	KHRR	Telemundo	Tucson	AZ	Tucson	68	NBC Telemundo Co.
64983	WKAQ	Telemundo	San Juan	PR	San Juan	n/a	NBC Telemundo Co.
23671	WWDP	not listed	Norwell	MA	Boston	7	Norwell Television, LLC
10897	WUPV	CW	Ashland	VA	Richmond- Petersburg	59	Southeastern Media, Inc.
3228	WFXG	Fox	Augusta	GA	Augusta	115	Southeastern Media, Inc.
12472	WXTX	Fox	Columbus	GA	Columbus	128	Southeastern Media, Inc.
72871	WSFX	Fox	Wilmington	NC	Wilmington	135	Southeastern Media, Inc.
49330	KXAS	NBC	Ft. Worth	TX	Dallas-Ft. Worth	5	Station Venture Operations, LP
35277	KNSD	NBC	San Diego	CA	San Diego	27	Station Venture Operations, LP

3113	WVXF	CBS	Charlotte Amalie	VI	Charlotte Amalie	n/a	Storefront Television, LLC
64033	WPCH	not listed	Atlanta	GA	Atlanta	8	Superstation, Inc.
73226	WLS	ABC	Chicago	IL	Chicago	3	The Walt Disney Co.
34470	KGO	ABC	San Francisco	CA	San Francisco-Oakland-San Jose	6	The Walt Disney Co.
35675	KTRK	ABC	Houston	TX	Houston	10	The Walt Disney Co.
8617	WTVD	ABC	Durham	NC	Raleigh-Durham	28	The Walt Disney Co.
8620	KFSN	ABC	Fresno	CA	Fresno-Visalia	55	The Walt Disney Co.
21735	WJRT	ABC	Flint	MI	Flint-Saginaw-Bay City	66	The Walt Disney Co.
74150	WTVG	ABC	Toledo	OH	Toledo	72	The Walt Disney Co.
73879	WPHL	MyNetworkTV	Philadelphia	PA	Philadelphia	4	Tribune Broadcast, Inc.
22201	KDAF	CW	Dallas	TX	Dallas-Ft. Worth	5	Tribune Broadcast, Inc.
33894	KCPQ	Fox	Tacoma	WA	Seattle-Tacoma	14	Tribune Broadcast, Inc.
69571	KZJO	not listed	Seattle	WA	Seattle-Tacoma	14	Tribune Broadcast, Inc.
10192	KRCW	CW	Salem	OR	Portland	23	Tribune Broadcast, Inc.
146	WXIN	Fox	Indianapolis	IN	Indianapolis	26	Tribune Broadcast, Inc.
56523	WTTV	CW	Bloomington	IN	Indianapolis	26	Tribune Broadcast, Inc.
56526	WTTK	CW	Kokomo	IN	Indianapolis	26	Tribune Broadcast, Inc.
147	WTIC	Fox	Hartford	CT	Hartford & New Haven	29	Tribune Broadcast, Inc.
68433	WXMI	Fox	Grand Rapids	MI	Grand Rapids-Kalamazoo-Battle Creek	39	Tribune Broadcast, Inc.
10213	WPMT	Fox	York	PA	Harrisburg-Lancaster-Labanon-York	41	Tribune Broadcast, Inc.
54280	WNOL	CW	New Orleans	LA	New Orleans	53	Tribune Broadcast, Inc.
72119	WGNO	ABC	New Orleans	LA	New Orleans	53	Tribune Broadcast, Inc.
83304	WCVI	CW	Christiansted	VI	Christiansted	n/a	Virgin Blue, Inc.
589	WAFB	CBS	Baton Rouge	LA	Baton Rouge	94	WAFB, LLC
591	WAFF	NBC	Huntsville	AL	Huntsville-Decatur	83	Waff Subsidiary, LLC
70713	WALB	NBC	Albany	GA	Albany	146	Walb Subsidiary, LLC
13989	WAVE	NBC	Louisville	KY	Louisville	48	WAVE, LLC
30826	WBTV	CBS	Charlotte	NC	Charlotte	25	WBTV, LLC
32326	WCNC	NBC	Charlotte	NC	Charlotte	25	WCNC-TV, Inc.
71297	WCSC	CBS	Charleston	SC	Charleston	100	WCSC LLC
21250	WDAM	NBC	Laurel	MS	Hattiesburg-Laurel	168	WDAM, LLC
30576	WDCW	CW	Washington	DC	Washington, DC	9	WDCW Broadcasting, Inc.
32851	WDFX	Fox	Ozark	AL	Dothan	172	WDFX, LLC
48666	WECT	NBC	Wilmington	NC	Wilmington	135	WECT, LLC

71725	WOLE	not listed	Aguadilla	PR	Aguadilla	n/a	Western Broadcasting Corp.
72054	WFAA	ABC	Dallas	TX	Dallas-Ft. Worth	5	WFAA-TV, Inc.
13991	WFIE	NBC	Evansville	IN	Evansville	101	WFIE, LLC
39736	WFLX	Fox	West Palm Beach	FL	West Palm Beach-Ft. Pierce	38	WFLX, LLC
9635	WFRV	CBS	Green Bay	WI	Green Bay-Appleton	70	WFRV and WJMN TV Station, Inc.
9630	WJMN	CBS	Escanaba	MI	Marquette	179	WFRV and WJMN TV Station, Inc.
72115	WGN	CW	Chicago	IL	Chicago	3	WGN Continental Broadcasting
13990	WIS	NBC	Columbia	SC	Columbia	81	WIS, LLC
39738	WXIX	Fox	Newport	KY	Cincinnati	33	WIXX Subsidiary, LLC
68542	WLBT	NBC	Jackson	MS	Jackson	90	WLBT, LLC
13995	WLOX	ABC	Biloxi	MS	Biloxi-Gulfport	160	WLOX, LLC
83969	WMBF	NBC	Myrtle Beach	SC	Myrtle Beach-Florence	103	WMBF, LLC
19184	WMC	NBC	Memphis	TN	Memphis	47	WMC, LLC
8532	WUAB	MyNetworkTV	Lorain	OH	Cleveland-Akron	17	WOIO, LLC
39746	WOIO	CBS	Shaker Heights	OH	Cleveland-Akron	17	WOIO, LLC
2942	WPGX	Fox	Panama City	FL	Panama City	154	WPGX, LLC
73881	WPIX	CW	New York	NY	New York City	1	WPIX, Inc.
13993	WSFA	NBC	Montgomery	AL	Montgomery-Selma	118	WSFA, LLC
19200	WTNZ	Fox	Knoxville	TN	Knoxville	58	WTNZ, LLC
590	WTOC	CBS	Savannah	GA	Savannah	97	WTOC, LLC
13992	WTOL	CBS	Toledo	OH	Toledo	72	WTOL, LLC
595	WTVM	ABC	Columbus	GA	Columbus	128	WTVM, LLC
14050	WCCT	not listed	Waterbury	CT	not listed	not listed	WTVX Inc.
74167	WVEC	ABC	Hampton	VA	Norfolk-Portsmouth-Newport News	42	WVEC Television, Inc.
30833	WWBT	NBC	Richmond	VA	Richmond-Petersburg	59	WWBT, LLC
74192	WWL	CBS	New Orleans	LA	New Orleans	53	WWL-TV, Inc.